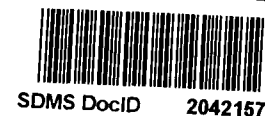




UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103 2029



ORIGINAL

Via First Class Mail

Lesley Chrisner  
Envires Corporation  
2137 Defense Hwy, Suite 11-D  
Crofton, MD 21114

December 2, 2004

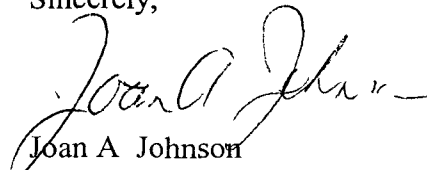
RE Malvern TCE Superfund Site

Dear Ms Chrisner

As requested, enclosed kindly find a copy of the Appendix A to the proposed Administrative Order on Consent for *De Minimis* Settlement, Docket No CERC-03-2003-0041 ("AOC")

Please do not hesitate to contact me if you have any questions

Sincerely,

  
Joan A Johnson



APPENDIX AList of AOC III Respondents

- 1 Allister Manufacturing Corporation/C P Allstar Corporation/Relm Wireless Corporation
- 2 Athena Controls, Inc
- 3 Ametek, Inc
- 4 Airline Hydraulics Corporation
- 5 BFI Waste Service of Pennsylvania, LLC/BFI Waste Systems of North America,  
Inc /Browning-Ferris Industries a/k/a Allied Waste
- 6 Camdel Metals Corporation
- 7 Carvel Hall, Inc /Syratech Corporation/CHI International, Inc /Towle Manufacturing  
Company
- 8 CK Systematics Inc /Systematics, Inc
- 9 E Frank Hopkins Company, Inc
- 10 Fabric Development, Inc
- 11 Fergusson-McKenna Supply, Inc
- 12 Fraser-Volpe Corporation
- 13 Gulf & Western Industries, Inc /Collins & Aikman Products Co /Heartland Industrial  
Partners, L P
- 14 High Energy Corporation
- 15 Kosempel Manufacturing Company
- 16 Leeds & Northrup Company/SPX Corporation
- 17 Matheson Instruments, Inc /Matheson Tri-Gas, Inc
- 18 Model Finishing Company, Inc
- 19 Narco Avionics, Inc

- 20 Oxford Metal Products Co , Inc
- 21 Philco-Ford Corporation/Loral Space & Communications, Ltd /Space Systems/Loral, Inc /Ford Motor Company, Inc
- 22 Princo Instruments, Inc
- 23 Prodelin, Inc /M/A-COM, Inc
- 24 Sermetal, Inc /Sermetech International Incorporated/Teleflex Incorporated
- 25 Solid State Scientific, Inc /American Financial Group, Inc
- 26 Xynatech Inc , (NM Corp)/Xynatech Inc , (PA Corp)/National Metalcrafters (PA Corp)/Xynatech Manufacturing (PA Corp)



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103 2029

ORIGINAL

Via First Class Mail

Lesley Chrisner  
Envires Corporation  
2137 Defense Hwy, Suite 11-D  
Crofton, MD 21114

September 30, 2004

RE Malvern TCE Superfund Site

Dear Ms Chrisner

As requested, enclosed kindly find a copy of the proposed Administrative Order on Consent for *De Minimis* Settlement, Docket No CERC-03-2003-0041 ("AOC")

Please do not hesitate to contact me if you have any questions

Sincerely,

A handwritten signature in cursive script that reads "Joan A. Johnson".

Joan A. Johnson





UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III  
1650 Arch Street  
Philadelphia, Pennsylvania 19103 2029

ORIGINAL

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

AUG 18 2003

To Addressees

Re Malvern TCE Superfund Site  
**Notice of Potential Liability and  
Opportunity to Participate in Third Round *De Minimis* Settlement**

Dear Sir or Madam

The purpose of this letter is to provide you<sup>1</sup> with an opportunity to participate in a third round *de minimis* settlement, Administrative Order on Consent for *De Minimis* Settlement, Docket No CERC-03-2003-0041 ("AOC III"), relating to the Malvern TCE Superfund Site ("Site"). This settlement is offered by the United States Environmental Protection Agency ("EPA") under the *de minimis* settlement provisions of CERCLA, including Section 122(g), 42 U S C § 9622(g).

This letter also (1) shall provide you with information concerning recent cleanup efforts at the Site, (2) notify you that your company may be potentially liable for contamination at the Site pursuant to Section 107(a) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U S C § 9607(a), and (3) inform you of future steps in the settlement process. A list of recipients of this AOC III *De Minimis* offer letter is attached as Enclosure "A."

1 ***Site Background***

CERCLA, more commonly known as Superfund, has several key objectives including setting priorities for cleanup of the worst hazardous sites in the country, and, determining the parties potentially responsible for investigating, cleaning up or paying the costs of cleaning up such hazardous sites. These parties are referred to as "potentially responsible parties" or "PRPs."

On October 14, 1992, the United States Environmental Protection Agency ("EPA") included the Site on the National Priorities List ("NPL"), a list of the most serious uncontrolled or abandoned sites at which releases of hazardous substances have occurred or may occur. For a more detailed discussion of the Site background, please see Enclosure "B."

---

<sup>1</sup> For the purposes of this letter, the term "you" shall refer to either an individual, a company, a partnership, a sole proprietorship, a corporation, and/or the successors, assigns, or heirs of any of the aforementioned legal entities, whichever is applicable.

## 2 *Notice of Potential Liability*

Some recipients of this letter may have previously received a notice advising them of their potential liability regarding the Site. Other recipients of this letter may not have previously received a notice advising them of their potential liability with respect to the Site. This letter shall serve as notification of your potential liability to the extent that such notice has not been previously provided.

For each recipient of this letter that has not previously received a notice of liability, EPA has enclosed (Enclosure "G") Site documents that refer to transactions of each such recipient with the Site. EPA has evaluated this information and has determined that you may be a PRP for this Site. PRPs under CERCLA include 1) current owners and operators of the site, 2) owners and operators of the site at the time hazardous substances were disposed, 3) persons who arranged for disposal or treatment of hazardous substances sent to the site, and 4) persons who accepted hazardous substances for transport to the site, and who selected the site for disposal. These categories are set forth in Section 107 of CERCLA, 42 U.S.C. § 9607.

EPA has documented the release or threatened release of hazardous substances, pollutants or contaminants at or from the Site, as those terms are defined in Sections 101(14) and 101(33) of CERCLA, 42 U.S.C. §§ 9601(14) and (33). EPA has spent, or is considering spending, public funds on actions to investigate and control such releases or threatened releases at the Site.

EPA may order PRPs, or any one of them, to perform response actions deemed necessary by EPA to protect the public health, welfare or the environment. Additionally, PRPs may be liable for all costs incurred by the government in responding to any release or threatened release at the Site, under Sections 104 and 107(a) of CERCLA, 42 U.S.C. §§ 9604 and 9607(a), and the Resource Conservation and Recovery Act, as amended, 42 U.S.C. §§ 6901 *et seq.*, and other laws. Such actions and costs may include, but are not limited to, conducting a Remedial Design/Remedial Action, and other investigation, planning, response, oversight, and enforcement activities related to the Site. Such persons may also be liable to other persons who have spent their own money performing cleanup actions at the Site. In addition, PRPs may be required to pay for damages for injury to, destruction of, or loss of natural resources, including the cost of assessing the amount or extent of such damages related to a site. Each responsible party may be jointly and severally liable for the entire cost of cleanup.

You should also be aware that once a site is placed on the NPL pursuant to Section 105 of CERCLA, 42 U.S.C. § 9605, it cannot be deleted until after a Remedial Investigation/Feasibility Study has been completed and the necessary remedial action has been conducted in accordance with EPA guidance and the National Contingency Plan, published at 40 C.F.R. Part 300.

By this letter, EPA notifies you of your potential liability with regard to this matter and encourages you to perform or to finance voluntarily those response activities that EPA determines to be necessary at the Site.

1      ***"De Minimis" Settlements***

This letter also serves as notice to all parties listed on Enclosure "A" ("AOC III De Minimis Settlement Offerees") of the opportunity to participate in a *de minimis* settlement with EPA in connection with the Site. Based on EPA's review of the records pertaining to the Site, you appear to be responsible for a relatively small amount of hazardous substances at the Site. Therefore, you are being offered this opportunity to settle as a *de minimis* party.

Pursuant to CERCLA, 42 U.S.C. § 9601, *et seq.*, EPA has conducted and overseen a number of activities at the Site in response to the release and/or threat of release of hazardous substances, pollutants, and/or contaminants into the environment, described above and in Enclosure "B."

Under Section 122(g) of CERCLA, EPA may offer special settlements to *de minimis* PRPs. Any party who settles its liability to the United States pursuant to this *de minimis* settlement will not be required to perform Site cleanup work. Instead, the *de minimis* settlor will pay an amount calculated by EPA to represent that party's proportionate share of costs already incurred and to be incurred at the Site, plus a premium, which accounts for, among other things, uncertainties in the costs of work not yet performed. In exchange for this cash payment, EPA will agree not to sue or take other civil action against the *de minimis* settlor with regard to this Site and will provide the *de minimis* settlor with contribution protection (see discussion in Section 3.B.3), subject to the settlor's compliance with the terms of the settlement.

EPA previously entered into two *de minimis* settlements relating to the Site. EPA entered in an Administrative Order on Consent for De Minimis Settlement, Docket No. III-98-074-DC ("AOC I") with 150 *de minimis* parties, effective on September 28, 1999, in connection with the Site. EPA entered into Administrative Order on Consent for De Minimis Settlement, Docket No. III-CERCLA-03-2001-0381 ("AOC II") with nine *de minimis* parties, effective June 11, 2002.

The enclosed third Administrative Order by Consent for *De Minimis* Settlement, Docket No. CERC-03-2003-0041 ("AOC III") (Enclosure "C") sets forth the terms for concluding your liability to the United States for response costs incurred or to be incurred under CERCLA. EPA has released this AOC III for your signature. This opportunity to settle under the terms described herein is being offered for a limited time. **EPA will accept your signature on the AOC III through close of business September 10, 2003.**

In order to assist you in your review of the specific terms of the Malvern TCE Superfund Site *de minimis* settlement offer, the following information is provided:

A      **De Minimis Settlement Eligibility**1      **Small Waste Contributors**

PRPs may be eligible for *de minimis* settlements if such parties contributed a minimal amount of hazardous substances, in comparison to other hazardous substances at the Site.

In addition, the toxicity or other hazardous effects of the hazardous substances contributed by a PRP to the Site must not be significantly greater than that of other hazardous substances at the Site

## 2 Volumetric Ranking Summary

Small waste contributors eligible for *de minimis* settlement have been identified by EPA by utilizing volumetric ranking summaries prepared for the Site. EPA has prepared a volumetric ranking summary, dated July 29, 2003 ("AOC III VRS"), setting forth waste-in and *de minimis* payment amounts for proposed AOC III PRPs, for use in connection with this proposed AOC III. For ease of reference, the AOC III VRS (which is Appendix "D" of the AOC III) is attached as Enclosure "D". Similarly, EPA prepared volumetric ranking summaries for use in connection with AOC I and AOC II.<sup>2</sup> AOC I VRS and AOC II VRS are attached to the AOC III (Enclosure "C" of this letter) as Appendices "C-1" and "C-2".

The volumetric ranking summaries, AOC I VRS, AOC II VRS, AOC III VRS, prepared by EPA for the Site were compiled using comprehensive Site documents, including invoices, bills of lading, shipping orders and manifests, obtained by EPA from Chemcene. See Enclosure "E," "Malvern TCE Volumetric Ranking Summaries Overview and Methodology" ("VRS Overview and Methodology") and "VRS Explanation Sheet," for additional general information as to the methodology utilized and information contained in the summaries.

EPA has utilized the methodology described in Enclosure "E" when preparing AOC I VRS, AOC II VRS, and AOC III VRS.

The AOC III VRS provides, for each AOC III PRP, waste-in volume and percentage information for both the MPA and the FDA at the Site. Since all PRP waste into the Site was received and processed by Chemcene in the MPA, EPA has set the *de minimis* settlement eligibility cut-off at or less than 75% of the total MPA waste volume. Generator PRPs should refer to Generator Total Payment column in order to determine their total settlement payment. Broker/Transporter PRPs should refer both to the Generator Total Payment and the Broker/Transporter Payment, to the extent applicable, columns to determine their total settlement payment.

In accordance with the Small Business Liability Relief and Brownfields Revitalization Act, Public Law 107-118 ("Brownfields Act"), enacted in January 2002, parties that contributed less than 2 drums to the Site will be considered *de minimis* parties. The Brownfields Act provides for a limitation of liability for *de minimis* parties.

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<sup>2</sup> Volumetric Ranking Summaries dated December 16, 1998 ("AOC I VRS") were utilized by EPA in connection with AOC I. Volumetric Ranking Summaries dated May 29, 2001 ("AOC II VRS") were utilized by EPA in connection with AOC II.



Based on on-going research and attempts to identify viable PRPs, additional parties have been identified as orphans for purposes of the third *de minimis* settlement. In addition, EPA's past costs at this Site have increased and are reflected in the AOC III VRS. The basic methodology for calculating the *de minimis* payments has not changed.

B De Minimis Settlement Terms

1 De Minimis Settlement Payment

In order to participate in this settlement, each AOC III PRP must agree to pay the amount listed next to its company in the "Total *De Minimis* Payment" column on the AOC III VRS (Enclosure "D")

The total payment amount represents each AOC III PRP's FDA and MPA percentage contribution towards past costs incurred by EPA at the Site and estimated future costs to clean up the Site, plus a premium payment.

For purposes of this settlement offer, EPA has estimated that the total response costs incurred and to be incurred at or in connection with the Site by the EPA Superfund and by private parties is \$21,697,339.80. This amount includes \$5,302,459.63 in response costs incurred by EPA through June 25, 2002, \$359,739.17 in response costs incurred by DOJ through May 3, 2003, \$811,961.00 in response costs incurred by the RD/RA Consent Decree PRPs in completing installation of a public water supply, as required by the RD/RA Consent Decree, and Future Response Costs in the amount of \$15,223,180.00 (estimated future Site remedial costs in the amount of \$15,023,180.00, and EPA future remedial oversight costs estimated to be \$200,000.00).

The premium payment is determined based upon a variety of factors specific to both the Site and the settlement. EPA has utilized a one hundred twenty-five percent (125%) premium for any AOC III PRPs that did not receive from EPA an offer to participate in AOC I. EPA has utilized a two hundred twenty-five percent (225%) premium for any AOC III PRPs that received from EPA an offer to participate in AOC I, but failed to participate in that settlement.

In order to determine an AOC III PRP's total *de minimis* settlement payment, EPA has divided costs associated with the FDA and the MPA and calculated total payment amounts for each of these areas.

EPA is in the process of reviewing information concerning the selected remedy for the Site, and in particular, for soil remediation at the FDA and groundwater remediation at the MPA. This review could have the effect of altering the selected remedy at the Site and of subsequently lowering or raising the projected future costs at the Site. Future changes to the remedy and consequential changes to the projected future costs associated with the Site, will have no effect on this settlement offer, except to the extent that total remedial costs exceed \$31.2 million. In the event remedial costs do exceed \$31.2 million, EPA has provided for a reopener of liability provision.

2      Covenant Not to Sue

EPA will provide each AOC III PRP with a covenant not to sue. This provision is a promise that EPA will not bring any future legal actions against you regarding the Site and the specific matters identified by the settlement, provided that EPA's information regarding the volume and toxicity of your wastes is correct.

3      Contribution Protection

EPA will provide each settling AOC III PRP with contribution protection. This provision offers you protection from being sued by other PRPs at the Site. Frequently, major waste contributors will sue small waste contributors to recover clean up costs. A *de minimis* settlement provides protection from such suits that extends to all issues covered by the settlement.

C      Information to Assist PRPs

1      Information about the Site

In addition to the information contained in this letter, key documents about the Site are available for your review at EPA's website [www.epa.gov/arweb](http://www.epa.gov/arweb).

2      Other *De Minimis* Parties

In connection with the Site *de minimis* settlements, EPA is aware of the following who has served as a *de minimis* PRP representative:

Philip L. Hinerman, Esq.  
Fox, Rothchild, O'Brien & Frankel, LLP  
200 Market Street  
Philadelphia, PA 19103-3291  
(215) 299-2000

3      Other Site PRPs

EPA has identified PRPs at the Site that EPA has determined are not eligible for *de minimis* settlement and to whom this AOC III settlement offer has not been extended. These PRPs are those with an MPA % of greater than 75%. An address list, reflecting the names and addresses of all Site PRPs, including both *de minimis* and those not eligible for *de minimis* settlement, is attached (Attachment "F").

ORIGINAL

D Form of the Settlement

This settlement offer is extended only to the addressees of this letter **EPA will accept your signature on the AOC III through close of business September 10, 2003** Executed signature pages may be sent to the following

Joan A. Johnson, Sr Assistant Regional Counsel (3RC41)  
U S Environmental Protection Agency  
Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

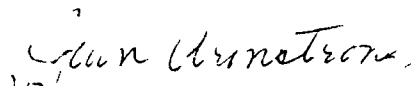
Once the parties have signed the AOC III, there will be a public comment period pursuant to Section 122(i) of CERCLA, 42 U S C § 9622(i). In accordance with Section 122(i)(3) of CERCLA, 42 U S C § 9622(i)(3), EPA may withdraw its consent to the AOC III if comments received disclose facts or considerations that indicate that the AOC III is inappropriate, improper, or inadequate. If the comments received do not require modification of, or EPA withdrawal from, the AOC III, the effective date of the AOC III shall be the date upon which EPA issues written notice to the AOC III PRPs/Settlers.

If you already are involved in discussions with State or local authorities, engaged in voluntary action, or involved in a lawsuit regarding this Site, you should not interpret this letter as advising or directing you to restrict or to discontinue any such activities. You should, however, report the status of those discussions or activities in your letter to EPA. The factual and legal discussions contained in this letter are intended solely for notification and information purposes. They are not intended to be, and cannot be relied upon, as a final EPA position on any matter set forth herein.

EPA has determined that some of the companies receiving this letter may be small businesses under the Small Business Regulatory Enforcement and Fairness Act ("SBREFA"). Please see Enclosure "H" to this letter. This information has been provided for informational purposes only pursuant to EPA policy, and is not intended to influence any PRP's decision to enter into settlement negotiations pursuant to this letter.

If you have any questions relating to the foregoing, you may call Patrick Egan, Civil Investigator, at (215) 814-3167.

Sincerely,

  
Henry J. Sokolowski, P.E., Chief  
Superfund Enforcement &  
Federal Facilities Branch

Enclosures

Enclosure A- AOC III De Minimis Settlement Offerees

Enclosure B - Site Background

Enclosure C - AOC III, with the following Appendices

Appendix A - List of AOC III PRPs/Settlers

Appendix B - Site Map

Appendix C-1 - AOC I VRS

Appendix C-2 - AOC II VRS

Appendix D - AOC III VRS

Enclosure D - AOC III VRS

Enclosure E - Volumetric Ranking Summaries Overview and Methodology

Enclosure F - Comprehensive Mailing List

Enclosure G - Site Documents

Comprehensive Transaction Reports

Enclosure H - Small Business Regulatory and Enforcement Fairness Act Information  
Sheet

cc Patrick Egan (3HS11)  
Joan A Johnson (3RC41)  
Charlie Root (3HS21)  
Mark Stevens, Esq (Chemclene Site Defense Group)

ORIGINAL

Enclosure A  
AOC III De Minimis Settlement Offerees

ENCLOSURE A  
AOC III De Minimis Settlement Offerees

Accuracy Scientific Instruments Inc  
Airline Hydraulics Corporation  
Allister Manufacturing Co  
Ametek, Inc  
Amp Corporation  
Ark Products Co , Inc  
Athena Controls, Inc  
Bishop Tube Co  
C K Systematics, Inc  
Camdel Metals Inc  
Carvel Hall Inc c/o Syratech  
Chem Solv Inc  
Contamination Control, Inc  
David K. Robson, Inc  
E Frank Hopkins Co  
Emeco Industries, Inc  
Fabric Development, Inc  
Fairfax Cleaners  
Fergusson Solvents Company  
Frazer-Volpe Corporation  
FTC Hazardous, Inc  
G K Garrett Corporation  
Glah Brothers, Inc  
Gulf & Western Industries, Inc  
High Energy Corporation  
Hulltronics, Inc  
J&J Spill Services & Supplies, Inc  
Keystone Transformer  
Kosempel Manufacturing Company  
Leeds & Northrup Company  
Lightman Drum Co , Inc  
Malco Inc  
Matheson Instruments  
McClarin Plastics, Inc  
Model Finishing Co , Inc  
Narco Avionics, Inc  
National Metalcrafters, Inc  
Ni-Chro Finishing Company  
Oxford Metal Products Co  
Penn Airborn Product c/o Transicoil  
Penske V D A  
Philadelphia Steel Drum Co , Inc

Philco Ford c/o Loral Space Systems, Inc  
Precision Arts Manufacturing, Inc  
Princo Instruments, Inc  
Prodelin Inc  
R C Kletzing Inc  
Sermetal Inc  
Shur-Kut Supply Corporation  
Solid State Scientific  
Storm Weather Products  
U S Environmental Services Inc  
Waste Consulting & Brokerage Inc  
Xynatech Inc

ORIGINAL

Enclosure B  
Site Background

Enclosure B  
Site Background

The Malvern TCE Superfund Site ("Site") is located at and near 258 N Phoenixville Pike, Malvern, East Whiteland Township, Pennsylvania

From 1952 until 1992, Chemcene Corporation ("Chemcene") sold and reclaimed industrial cleaning solvents, including trichloroethene ("TCE"), 1,1,1-trichloroethane ("1,1,1-TCA"), perchloroethylene ("PCE," also called tetrachloroethene), and methylene chloride ("MEC") These solvents were used by local industries for degreasing metal parts and other cleaning purposes Chemcene used a distillation process to remove impurities from the chlorinated solvents The distilled solvents were then resold to customers for reuse, or resold to other customers Chemcene utilized two areas of the Site as part of its operations, the Main Plant Area ("MPA") and the Former Disposal Area/Mounded Area ("FDA")

The end products of processing waste solvents are the reclaimed solvents and chlorinated still bottoms The chlorinated waste solvents are listed hazardous wastes pursuant to the Resource Conservation and Recovery Act ("RCRA") and, therefore, the resulting still bottoms are listed hazardous waste Prior to 1975, Chemcene reportedly buried drums containing the still bottom sludges from the distillation process in the FDA, approximately 1,900 feet southwest of the main plant The FDA consists of two unlined earthen pits, each approximately 30 feet by 50 feet by 15 feet deep This area is currently secured by an 8-foot high chain link fence The Mounded Area, located on the western edge of the FDA, is approximately 8 feet wide by 150 feet long

Chemcene's activities at the Site have been linked to the presence of volatile organic compounds ("VOCs") in the ground water and soil at the MPA and the FDA and the groundwater of the adjacent Spring Ridge Property These contaminants include TCE, PCE, 1,1,1-TCA, MEC, 1,1-DCE, among others, and are listed as hazardous substances under 40 C F R § 302.4

In the spring of 1980, TCE was detected in groundwater from several wells in the vicinity of the Chemcene facility At this time, Chemcene began sampling domestic wells in the immediate vicinity of the property Private domestic wells and on-Site monitoring wells were sampled by Pennsylvania's Department of Environmental Resources, now known as the Department of Environmental Protection, and Chemcene in June 1980 and July 1981 Analytical results revealed contamination of the underlying aquifer with chlorinated ethenes and related compounds TCE was detected in wells at concentrations up to 12,600 micrograms per liter ("µg/l"), far exceeding the Maximum Contaminant Level ("MCL") of 5.0 µg/l The Site was listed on the Superfund National Priorities List in September 1983 The contaminated home wells were located south of the FDA, with several located in the Hillbrook Circle residential development Chemcene furnished activated carbon filter units to twenty (20) residential wells within the Hillbrook Circle Development and conducted periodic sampling of home wells in accordance with its Domestic Well Management Plan until November 1994 In February 1995, EPA assumed control of maintenance activities of the carbon filter units and periodic sampling of



the home wells, after it was determined that Chemcene was not following the procedures outlined in its Domestic Well Management Plan. In August 1995, several of the filter systems were upgraded by EPA in response to analytical results from residential well samples that showed contamination was passing through the existing filters into the homes.

In addition to the installation of carbon filters, Chemcene conducted removal actions following the detection of soil and groundwater contamination in 1980. Debris and approximately 300 drums were removed from the FDA excavations, in a prolonged removal effort from 1981 to 1984. Soils underlying the FDA were excavated to a depth of 15 feet and transported for disposal at a RCRA permitted disposal facility. Additional drums were removed from the Mounded Area in late 1990, however, contaminated soil was left in place.

Four underground storage tanks were removed from the MPA in 1986. Soil samples collected from below the excavation grade of the tanks exhibited elevated concentrations of TCE, PCE, and 1,1,1-TCA. In addition, elevated levels of VOCs were detected in soil gas samples collected outside the distillation building in the MPA. These contaminant levels are believed to be related to Chemcene's past practices of discharging contaminated condensate from the recycling distillation process directly onto the ground surface.

As an operating facility, Chemcene entered into a RCRA Corrective Action Order with EPA in 1987. A RCRA Facilities Investigation ("RFI") Work Plan was approved for the Site in 1989. In July 1992, Chemcene withdrew its RCRA Part B Application as a treatment and storage facility, and to EPA's knowledge stopped accepting waste solvents for reclamation.

Chemcene failed to complete the RFI and implement interim corrective measures. As a result, EPA began considering the Site under the Superfund remedial program in November 1993. All existing data was compiled and a report was developed entitled Data Summary Report, April 1995. Based on EPA's review of the existing information, data gaps were identified and EPA was unable to conduct a Human Health or Ecological Risk Assessment. Accordingly, EPA conducted a Remedial Investigation ("RI") to complete the necessary data gathering at the Site. The RI was completed in January 1997. EPA completed a Feasibility Study relating to the Site in June 1997. The Proposed Plan for a comprehensive Site clean up was issued in June 1997. In November 1997, EPA issued a Record of Decision ("ROD") selecting a final remedy for cleanup of the Site. Available information indicates that Chemcene ceased operations in the Fall of 1999.

In April 1998, EPA notified approximately 250 generator and transporter potentially responsible parties ("PRPs") of their eligibility for a potential Superfund *de minimis* settlement regarding the Site. Additionally, in May 1998, EPA issued Special Notice Letters to approximately 40 non-*de minimis* potentially responsible parties which notified them of their opportunity to resolve their liability with respect to the Site.

In May 1999, EPA and 169 *de minimis* parties entered into an Administrative Order on

Consent, which became effective September 28, 1999. In December 1999, the U S District Court for the Eastern District of Pennsylvania entered a Remedial Design/Remedial Action Consent Decree ("RD/RA Consent Decree") between EPA and 35 non-*de minimis* parties ("RD/RA Consent Decree PRPs"). Among other things, the RD/RA Consent Decree PRPs agreed to implement the Remedial Design and Remedial Activity specified in the November 1997 ROD. In May 2001, EPA and nine additional *de minimis* parties entered into an Administrative Order on Consent, which became effective June 11, 2002.

In accordance with obligations set forth in the RD/RA Consent Decree, the RD/RA Consent Decree PRPs have commenced response actions at the Site. Among other things, the RD/RA Consent Decree PRPs have provided a public water supply to certain residences located near or adjacent to the Chemcene facility. In addition, the RD/RA Consent Decree PRPs have completed a pre-design investigation of the Site and are commencing remedial design activities.

In December 2002, a number of RD/RA Consent Decree PRPs filed a contribution action (the "Litigation") against a number of Site PRPs, including *de minimis* PRPs that have not entered into any *de minimis* settlements with EPA. The Litigation, Civil Action, No. 02-8964, is pending in the United States District Court for the Eastern District of Pennsylvania. In response to the Litigation, EPA has received requests from a number of *de minimis* defendants seeking to settle their alleged CERCLA liability at the Site.

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Enclosure C  
Administrative Order of Consent III

1

**Appendix A**  
**List of AOC III PRPs/Settlors**

ORIGINAL

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION III

IN THE MATTER OF )  
 )  
Malvern TCE Superfund Site )  
258 N Phoenixville Pike )  
Malvern, Pennsylvania )  
 )  
Proceeding under Section 122(g)(4) )  
of the Comprehensive Environmental )  
Response, Compensation, and )  
Liability Act of 1980, as amended, )  
42 U S C 9622(g)(4) )  
 )

U S EPA Docket No  
CERC-03-2003-0041

ADMINISTRATIVE ORDER ON CONSENT  
FOR *DE MINIMIS* SETTLEMENT

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IN THE MATTER OF	)	
	)	
Malvern TCE Superfund Site	)	U S EPA Docket No
258 N Phoenixville Pike	)	CERC-03-2003-0041
Malvern, Pennsylvania	)	
	)	
Proceeding under Section 122(g)(4)	)	
of the Comprehensive Environmental	)	ADMINISTRATIVE ORDER
Response, Compensation, and	)	ON CONSENT FOR <i>DE MINIMIS</i>
Liability Act of 1980, as amended,	)	SETTLEMENT
42 U S C § 9622(g)(4)	)	
	)	

## I JURISDICTION

- A This Administrative Order on Consent ("Consent Order" or "Order") is issued pursuant to the authority vested in the President of the United States by Section 122(g)(4) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended ("CERCLA"), 42 U S C § 9622(g)(4), to reach settlements in actions under Section 106 or 107 of CERCLA, 42 U S C § 9606 or 9607. The authority vested in the President has been delegated to the Administrator of the United States Environmental Protection Agency ("EPA") by Executive Order 12580, 52 Fed. Reg. 2923 (Jan. 29, 1987), and further delegated to the Regional Administrators of the EPA by EPA Delegation No. 14-14-E (September 13, 1987).
- B This Consent Order represents a third Administrative Order On Consent for *De Minimis* Settlement entered into by and between EPA and *de minimis* potentially responsible parties (PRPs) for the Malvern TCE Superfund Site.
- C This Consent Order is entered into voluntarily by and between EPA and each of the *de minimis* potentially responsible parties listed in Appendix "A" who have executed the attached signature pages ("AOC III Respondents"). Each AOC III Respondent agrees to undertake all actions required by the terms and conditions of this Order. Each AOC III Respondent consents to and will not contest EPA's jurisdiction to issue this Order or to implement or enforce its terms.
- D The AOC III Respondents agree and submit that the United States District Court for the Eastern District of Pennsylvania has jurisdiction over this Consent Order for the purposes of any subsequent proceedings for implementation or enforcement of this Order because a release or threatened release of hazardous substances has occurred at the Malvern TCE Superfund Site ("Site") in Malvern, Chester County, Pennsylvania, as hereinafter defined, which is located in such judicial district.

- E This Consent Order was agreed to and executed by EPA and the AOC III Respondents in good faith to avoid the expense and delay of litigation over the matters addressed by this Consent Order
- F EPA and the AOC III Respondents agree that this Consent Order is entered into without any admission of liability for any purpose as to any matter arising out of the transactions or occurrences alleged in the Order. The participation of the AOC III Respondents in this Order shall not be considered an admission of liability and shall not be admissible in evidence against the AOC III Respondents in any judicial or administrative proceeding other than proceedings to implement or enforce this Order or a judgement relating to it

## **II STATEMENT OF PURPOSE**

- 1 By entering into this Consent Order, the mutual objectives of the Parties are
- a to reach a final settlement among the Parties with respect to the Site pursuant to Section 122(g) of CERCLA, 42 U S C § 9622(g), that allows the AOC III Respondents to make a cash payment, including a premium, to resolve their alleged civil liability under Sections 106 and 107 of CERCLA, 42 U S C §§ 9606 and 9607, for injunctive relief with regard to the Site and for response costs incurred and to be incurred at or in connection with the Site, thereby reducing litigation relating to the Site, subject to a reopener specified in Paragraph 31 below,
  - b to simplify the remaining enforcement activities concerning the Site by reducing to the extent possible the number of parties involved in the Site,
  - c to reimburse the Hazardous Substances Superfund for a portion of the response costs incurred or to be incurred in connection with the Site without waiving the United States' assertion of joint and several liability against parties other than the AOC III Respondents

## **III PARTIES BOUND**

- 2 This Consent Order shall apply to and be binding upon EPA, and upon the AOC III Respondents, and their successors and assigns. Each signatory to this Consent Order represents that he or she is fully authorized to enter into the terms and conditions of this Consent Order and to execute and bind legally the Party represented by him or her. Any change in ownership or corporate status of any AOC III Respondent, including, but not limited to, any transfer of assets or real or



personal property, shall in no way alter such AOC III Respondent's responsibilities under this Consent Order

#### IV DEFINITIONS

- 3 Unless otherwise expressly provided herein, terms used in this Consent Order that are defined in CERCLA or in regulations promulgated under CERCLA shall have the meaning assigned to them in the statute or regulations. Whenever the terms listed below are used in this Consent Order, the following definitions shall apply
- a "AOC I" or "*De Minimis* AOC I" shall mean the Administrative Order on Consent, Docket No. III-98-074-DC, by and between EPA and certain *De Minimis* PRPs ("AOC I Respondents") that became effective on or about September 28, 1999, in connection with the Site
  - b "AOC I VRS" shall mean volumetric ranking summaries, dated November 30, 1998, prepared by EPA in connection with the AOC I. The AOC I VRS set forth each *De Minimis* PRP's volumetric shares and settlement amounts to be paid in order to participate in the AOC I. AOC I VRS is attached as Appendix "C-1."
  - c "AOC II" or "*De Minimis* AOC II" shall mean the Administrative Order on Consent, Docket No. III-CERCLA-03-2001-0381, by and between EPA and certain *De Minimis* PRPs ("AOC II Respondents") that became effective on or about June 11, 2002, in connection with the Site
  - d "AOC II VRS" shall mean volumetric ranking summaries prepared by EPA in connection with the AOC II. The AOC II VRS set forth each AOC II Respondent's volumetric shares and settlement amounts to be paid in order to participate in the *De Minimis* AOC II. AOC II VRS is attached as Appendix "C-2."
  - e "AOC III VRS" shall mean volumetric ranking summaries prepared by EPA in connection with the AOC III. The AOC III VRS set forth each AOC III Respondent's volumetric shares and settlement amounts to be paid in order to participate in the AOC III
  - f "CERCLA" shall mean the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, as amended, 42 U.S.C. § 9601, et seq

- g "Consent Order," "Order," or "AOC III," shall mean this Administrative Order on Consent and all appendices attached hereto. In the event of conflict between this Order and any appendix, the Order shall control.
- h "Day" shall mean a calendar day unless expressly stated to be a working day. "Working day" shall mean a day other than a Saturday, Sunday, or Federal holiday. In computing any period of time under this Consent Order, where the last day would fall on a Saturday, Sunday, or Federal holiday, the period shall run until the close of business of the next working day.
- i "*De Minimis* PRPs" shall mean all potentially responsible parties identified by EPA for the Site eligible to participate in a *de minimis* settlement, as listed in the AOC I VRS, attached as Appendix "C-1," AOC II VRS, attached as Appendix "C-2," and/or AOC III VRS, attached as Appendix "D."
- j "DOJ Past Response Costs" shall mean all Response Costs, including but not limited to, direct and indirect costs that DOJ has paid at or in connection with the Site through May 3, 2003, plus Interest on all such costs which has accrued pursuant to 42 U.S.C. § 9607(a) through such date.
- k "DOJ Future Response Costs" shall mean all Response Costs, including but not limited to, direct and indirect costs that may be incurred by DOJ in connection with the Site after May 3, 2003, plus Interest on all such costs.
- l "EPA" shall mean the United States Environmental Protection Agency and any successor departments, agencies or instrumentalities.
- m "EPA Hazardous Substance Superfund" shall mean the Hazardous Substance Superfund established by the Internal Revenue Code, 26 U.S.C. § 9507.
- n "EPA Past Response Costs" shall mean all Response Costs, including but not limited to, direct and indirect costs that EPA has paid at or in connection with the Site through June 25, 2002, as documented in the EPA Cost Report dated October 16, 2002, plus Interest on all such costs which has accrued pursuant to 42 U.S.C. § 9607(a) through such date.
- o "EPA Future Response Costs" shall mean all Response Costs, including but not limited to, direct and indirect costs and recoverable costs of oversight of removal or remedial actions, that may be incurred by EPA in

connection with the Site after June 25, 2002, plus Interest on all such costs

- p “Hazardous Substance” shall have the meaning provided in Section 101(14) of CERCLA, 42 U S C § 9601(14)
- q “Interest” shall mean interest at the current rate specified for interest on investments of the EPA Hazardous Substance Superfund established by 26 U S C § 9507, compounded annually on October 1 of each year in accordance with 42 U S C § 9607(a)
- r “National Contingency Plan” or “NCP” shall mean the National Oil and Hazardous Substances Pollution Contingency Plan promulgated pursuant to Section 105 of CERCLA, 42 U S C § 9605, as set forth at 55 Fed Reg 8,666 (March 8, 1990), and codified at 40 C F R Part 300, including any amendments thereto
- s “Natural Resources” shall have the meaning provided in Section 101(16) of CERCLA, 42 U S C § 9601(16)
- t “Paragraph” shall mean a portion of this Consent Order identified by an arabic numeral or an upper case letter
- u “Parties” shall mean EPA and the AOC III Respondents
- v “Remedial Costs” shall mean all response costs incurred in implementing the remedial action called for in the Record of Decision (“ROD”) dated November 26, 1997, and/or any Explanation for Significant Differences (“ESD”) and/or any amendment to that ROD, and/or any new ROD issued in place of that ROD
- w “RD/RA Consent Decree” shall mean the Remedial Design/Remedial Action Consent Decree that was entered on December 13, 1999, in connection with the Site in United States v Action Manufacturing Company, Inc , et al, Civil Action No 99-4402
- x “RD/RA Consent Decree PRPs” shall mean those Site PRPs that were signatories to the RD/RA Consent Decree
- y “Respondents III” or “AOC III Respondents” shall mean those persons, corporations, or other entities listed in Appendix “A,” and successors and assigns of such persons, corporations, or other entities, that are signatories to this Consent Order

- z "Response Costs" shall mean all costs of "response" as that term is defined by Section 101(25) of CERCLA, 42 U S C § 9601(25) incurred with respect to the Malvern TCE Superfund Site
- aa "Section" shall mean a portion of this Consent Order identified by a roman numeral
- bb "Site" shall mean the Malvern TCE Superfund Site, including areas defined in 40 C F R § 300.400(e), located at and around 258 N Phoenixville Pike in Malvern, Chester County, Pennsylvania and depicted more clearly on the map attached as Appendix "B "
- cc "United States" shall mean the United States of America, including its departments, agencies and instrumentalities

#### **V EPA'S STATEMENT OF FACTS**

- 4 The Site is located at and around 258 N Phoenixville Pike, Malvern, East Whiteland Township, Chester County, Pennsylvania. A Transcontinental Gas Pipeline Co. natural gas pipeline right-of-way extends along the southern boundary of the Site, with residential areas and areas with natural forestation and vegetation bordering the property to the west, north and east. The approximate area of the Site is identified on the map attached as Appendix "B "
- 5 The Site includes, but is not limited to, a parcel of approximately 5-acres at which Chemclene Corporation ("Chemclene"), from 1952 until 1992, among other things, sold and reclaimed industrial cleaning solvents including trichloroethene ("TCE"), 1,1,1-trichloroethane, perchloroethylene, and methylene chloride. These solvents were used by local industries for degreasing metal parts and other cleaning purposes. Chemclene used a distillation process to remove impurities from the chlorinated solvents. The distilled solvents were then returned to customers for reuse. The end products of processing waste solvents are the reclaimed solvents and chlorinated still bottoms. The chlorinated waste solvents are listed hazardous wastes pursuant to the Resource Conservation and Recovery Act ("RCRA"), 42 U S C § 6901 *et seq.*, and, therefore, the resulting still bottoms are listed hazardous waste. Wastes shipped to Chemclene were stored, processed, disposed, and bulk accumulated at the Site for eventual transfer to other locations, and a small amount was directly transshipped to other locations.
- 6 Chemclene utilized two areas of the Site, the Main Plant Area ("MPA") and the Former Disposal Area ("FDA"), as part of its business operations. Chemclene utilized the MPA to receive, accumulate, store, and process wastes, including

hazardous substances Wastes, including hazardous substances, also were released and disposed of at the MPA as a result of Chemclene's operations Chemclene disposed of wastes, including hazardous substances, at the FDA

- 7 In the spring of 1980, TCE was detected in groundwater from several wells in the vicinity of the Chemclene facility Private domestic wells and on-Site monitoring wells were sampled by Pennsylvania's Department of Environmental Resources and Chemclene in June 1980 and July 1981 Analytical results of this sampling revealed contamination of the underlying aquifer with chlorinated ethenes and related compounds
- 8 Pursuant to Section 105 of CERCLA, 42 U S C § 9605, EPA proposed the Site for listing on the National Priorities List ("NPL"), set forth at 40 C F R Part 300, Appendix ' B,' by publication in the Federal Register Final listing on the NPL as the Malvern TCE Superfund Site was in September 1983
- 9 Hazardous substances have been or are threatened to be released at or from the Site, including, but not limited to, at or from the MPA and FDA at the Site
- 10 Between 1981 and 1986, Chemclene commenced certain activities, including installation of filters on contaminated home wells located within a residential development south of the Chemclene property, FDA debris and drum removal and limited soil excavation, and removal of underground storage tanks and soil sampling at the MPA, to address EPA concerns of contamination at the Site In 1987, Chemclene entered into a Corrective Action Order pursuant to RCRA (Docket No RCRA-III-010-CA) with EPA Chemclene did not complete a RCRA Facilities Investigation of the Site or implement corrective measures at the Site, as required by the RCRA Order
- 11 As a result of the release or threatened release of hazardous substances, EPA has undertaken response actions at or in connection with the Site under Section 104 of CERCLA, 42 U S C § 9604, and will undertake response actions in the future Among other things, EPA
  - a assumed control of maintenance activities of filter units that had been installed on contaminated residential wells located south of the Site and of periodic sampling of residential wells,
  - b upgraded residential well filter systems in response to analytical results from well samples that showed contamination was passing through the existing filters into the homes,

- c conducted and completed in January 1997 a Remedial Investigation of the Site,
  - d completed a Feasibility Study of the Site in June 1997, and
  - e issued a Record of Decision in November 1997 pursuant to which EPA selected a remedy to be implemented at the Site
- 12 In performing these response actions, the EPA and DOJ have incurred and will continue to incur response costs. As of June 25, 2002, EPA had incurred \$5,302,459.63 in EPA Past Response Costs. As of May 3, 2003, DOJ had incurred \$359,739.17 in DOJ Past Response Costs. EPA and DOJ may incur, respectively, EPA Future Response Costs and DOJ Future Response Costs at the Site.
- 13 Commencing in 1996, EPA issued notice letters to approximately 250 Site PRPs, informing those PRPs of their potential liability pursuant to Section 107 of CERCLA, 42 U.S.C. Section 9607, in connection with the Site. Thereafter, EPA entered into the RD/RA Consent Decree with approximately 35 Site PRPs, pursuant to which the RD/RA Consent Decree PRPs agreed, among other things, to perform and fund the remedial action at the Site.
- 14 EPA also entered into two other Administrative Orders On Consent for *De Minimis* Settlement, AOC I and AOC II, with *De Minimis* PRPs in connection with the Site.
- 15 In December 2002, a number of RD/RA Consent Decree PRPs filed in the United States District Court for the Eastern District of Pennsylvania, Civil Action No. 02-8964, a contribution action against a number of Site PRPs, including *De Minimis* PRPs that have not entered into any *de minimis* settlements with EPA. EPA has received a number of requests from *de minimis* defendants, including many AOC III Respondents, seeking to settle their alleged CERCLA liability at the Site.
- 16 EPA has reviewed records describing the transactions of PRPs, including the *De Minimis* PRPs, in relation to the Site. These records include information describing the amount and nature of waste contributed to the Site. Based upon that review, EPA has determined that each *De Minimis* PRP, including each AOC III Respondent listed in Appendix "A," arranged for disposal or treatment, or arranged with a transporter for disposal or treatment, of a hazardous substance owned or possessed by such AOC III Respondent, at the Site, or accepted a hazardous substance for transport to the Site.

- 17 Information currently known to EPA indicates that each AOC III Respondent listed in Appendix ' A,' contributed between 1 6 drums and 0 75% of the total waste sent to the Site, and that the toxic or other hazardous effects of the hazardous substances contributed by each AOC III Respondent to the Site are not significantly more toxic than the other hazardous substances at the Site. The AOC III VRS lists, among other things, the estimated volume of waste contributed to the Site by each AOC III Respondent, and the percentage of waste contributed to the Site by each AOC III Respondent in relation to the total estimated volume of waste sent to the Site during the 1968 to 1992 time period. The volumes and percentage shares presented in the AOC III VRS represent EPA's best estimates and are based on all information currently in EPA's possession.
- 18 EPA has estimated that the total response costs incurred and to be incurred at or in connection with the Site by the EPA Hazardous Substance Superfund and by private parties is \$21,697,339 80. This amount includes \$5,302,459 63 in EPA Past Response costs, \$ 359,739 17 in DOJ Past Response costs, \$811,961 00 in response costs incurred by the RD/RA Consent Decree PRPs in completing installation of a public water supply, as required by the RD/RA Consent Decree, and Remedial Costs in the amount of \$15,223,180 00 (estimated future Site remedial costs in the amount of \$15,023,180 00, and EPA future remedial oversight costs estimated to be \$200,000 00). EPA has received certain information that indicates these estimated remedial costs could be revised.
- 19 The total payment required to be made by each AOC III Respondent pursuant to this Consent Order is set forth in the AOC III VRS, attached as Appendix "D ". The total payment to be made by each AOC III Respondent represents a minor portion of this total response costs incurred and to be incurred at or in connection with the Site, as referenced in Paragraph 18 of this Consent Order.
- 20 EPA has identified PRPs other than AOC III Respondents, who owned or operated the Site, or who arranged for disposal or treatment, or arranged with a transporter for disposal or treatment, at the Site, of a hazardous substance owned or possessed by such persons.

## **VI DETERMINATIONS**

- 21 Based upon the Statement of Facts set forth above and on the administrative record for this Site, EPA has determined that
- a the Site is a "facility" as that term is defined in Section 101(9) of CERCLA, 42 U S C § 9601(9)

- b each AOC III Respondent is a 'person' as that term is defined in Section 101(21) of CERCLA, 42 U S C § 9601(21)
- c each AOC III Respondent is liable within the meaning of Sections 107(a) and 122(g)(1) of CERCLA, 42 U S C §§ 9607(a) and 9622(g)(1)
- d the materials shipped to the Site by the AOC III Respondents include "hazardous substances" within the meaning of Section 101(14) of CERCLA, 42 U S C § 9601(14)
- e the past, present or future migration of hazardous substances from the Site constitutes an actual or threatened "release" as that term is defined in Section 101(22) of CERCLA, 42 U S C § 9601(22)
- f the Past Response Costs incurred and Future Response Costs to be incurred in connection with the Site are removal and remedial response costs within the meaning of Section 107(a) of CERCLA, 42 U S C § 9607(a)
- g prompt settlement with each AOC III Respondent is practicable and in the public interest within the meaning of Section 122(g)(1) of CERCLA 42 U S C § 9622(g)(1)
- h as to each AOC III Respondent, this Consent Order involves only a minor portion of the response costs at the Site within the meaning of Section 122(g)(1) of CERCLA, 42 U S C § 9622(g)(1)
- i each AOC III Respondent is eligible for a *de minimis* settlement pursuant to Section 122(g)(1)(A) of CERCLA, 42 U S C § 9622(g)(1)(A), since both the amount and the toxicity or other hazardous effects of the hazardous substances contributed to the Site by each AOC III Respondent is minimal in comparison to other hazardous substances at the Site

## VII ORDER

- 22 Based on the foregoing Statement of Facts and Determinations by EPA, in order to reach an expedited *de minimis* settlement in connection with the Site, in consideration of, and in exchange for, the promises, mutual undertakings, and covenants set forth herein, and intending to be legally bound hereby, EPA and the AOC III Respondents agree, and EPA hereby Orders, that the AOC III Respondents shall pay their cost share as set forth below



- a Within thirty (30) days of the effective date of this Order, each AOC III Respondent shall pay its volumetric share of the cost basis of \$21,697,339 80 This amount includes \$5,302,459 63 in EPA Past Response costs, \$ 359,739 17 in DOJ Past Response costs, \$811,961 00 in response costs incurred by the RD/RA Consent Decree PRPs in completing installation of a public water supply, as required by the RD/RA Consent Decree, and Remedial Costs in the amount of \$15,223,180 00 (estimated future Site remedial costs in the amount of \$15,023,180 00, and EPA future remedial oversight costs estimated to be \$200,000 00) The amount to be paid by each settling AOC III Respondent is set forth under the Total Payment Column included in the AOC III VRS, attached as Appendix "D "
- b The *de minimis* settlement payment required of each AOC III Respondent, as referred to in Paragraph 25 a of this Order, also includes a settlement premium This premium is designed to cover risks and uncertainties associated with this settlement, including but not limited to, the risk that total response costs incurred or to be incurred at or in connection with the Site by the EPA Hazardous Substance Superfund, or by any private party incurring Remedial Costs, will exceed the estimated total response costs, upon which Respondent's payments are based However, the premium is not designed to cover the risk that Site Remedial Costs will exceed \$31 2 million, and consequently, the Covenant Not to Sue is subject to the Reservation of Rights in 31

### **VIII PAYMENT**

23 Payments by AOC III Respondents shall be made as follows

- a Within thirty (30) days of the effective date of this Consent Order, each AOC III Respondent shall pay the amount listed for the AOC III Respondent in the AOC III VRS, attached as Appendix "D " to this Consent Order and as specified in Section VII (Order), above
- b Payment may be made by certified or cashier's check made payable to "EPA Hazardous Substance Superfund " Each check shall reference the name and address of the party making payment, the Site name, the EPA Region and Site Spill ID Number 03-91, and the EPA Docket Number for this action, and shall be sent to

EPA Superfund  
U S EPA/Region III  
Attention Superfund Accounting

P O Box 360515  
Pittsburgh, PA 15251-6515

Overnight night deliveries shall be sent to

Mellon Client Service Center  
Room 670  
500 Ross Street  
Pittsburgh, PA 15262-0001  
Attention EPA, Region III, P O Box 360515

Payment also may be made by electronic wire transfer. Each transfer shall reference the name and address of the party making payment, the Site name, the EPA Region and Site Spill ID Number 03-91, and the EPA Docket Number for this action, and shall be sent to

Mellon Bank  
Pittsburgh, PA  
ABA No 043000261  
credit EPA account number 9108552, lockbox 360515

Customer Service Phone Numbers are as follows  
412/234-4381 (lockbox)  
412/234-6200 (wire transfer)

- c At the time of payment, each AOC III Respondent shall send notice that such payment has been made to

Charlie Root (3HS21)  
Remedial Project Manager  
United States Environmental Protection Agency  
Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

- 24 EPA shall deposit any *de minimis* settlement proceeds received into a Malvern TCE Superfund Site special account within the EPA Hazardous Substance Superfund. The proceeds can be retained and used by EPA, or by a party designated by EPA, to conduct or finance response actions at or in connection with the Site and/or, at EPA's discretion, can be transferred to the EPA Hazardous Substance Superfund as reimbursement for response costs incurred at or in connection with the Site by the EPA Hazardous Substance Superfund. Any amounts remaining in a Malvern TCE Superfund Site special account shall be transferred by EPA to the EPA Hazardous Substance Superfund.

- 25 Any amounts due and owing by an AOC III Respondent pursuant to the terms of this Consent Order but not paid in accordance with the terms of this Consent Order shall accrue Interest, as defined in Paragraph 3 n of this Consent Order, which shall be assessed to such AOC III Respondent

### **IX FAILURE TO MAKE PAYMENT**

- 26 If any AOC III Respondent fails to make a payment under the terms of this Consent Order within thirty (30) days of the payment becoming due, this Consent Order shall be terminated and the Covenant Not to Sue set forth in Section XI, Paragraph 30, shall become null and void as to that AOC III Respondent
- 27 Nothing in this Consent Order shall be construed as prohibiting, altering, or in any way limiting the ability of the United States to seek any other remedies or sanctions available by virtue of a Respondent's violation of this Order or of the statutes and regulations upon which it is based, including, but not limited to, penalties pursuant to Section 122(l) of CERCLA, 42 U S C § 9622(l)

### **X CERTIFICATION OF RESPONDENTS**

- 28 By signing this Consent Order, each AOC III Respondent certifies, individually, that, to the best of its knowledge and belief, it has
- a conducted a thorough, comprehensive, good faith search for documents, and that to the best of its knowledge and belief, such AOC III Respondent has no information which would result in a material change of the information set forth in the AOC I VRS, AOC II VRS, and/or the AOC III VRS For purposes of this provision, a material change of the information set forth in the AOC I VRS, AOC II VRS, and/or AOC III VRS would occur if any PRP's Main Plant Area Percentage or Former Disposal Area Percentage listed in the AOC I VRS, AOC II VRS, and/or AOC III VRS changes by more than ten percent (10%) A material change of the information set forth in the AOC I VRS, the AOC II VRS, and/or AOC III VRS also would include any information that results in an increase in the MPA% for any PRP identified in the AOC I VRS, the AOC II VRS, and/or the AOC III VRS to greater than 0.75%,
  - b not altered, mutilated, discarded, destroyed or otherwise disposed of any records, documents, or other information relating to its potential liability regarding the Site after notification of potential liability or the filing of a suit against it regarding the Site, and

- c fully complied with any and all EPA requests for information regarding the Site pursuant to Sections 104(e) and 122(e) of CERCLA, 42 U S C §§ 9604(e) and 9622(e) and Section 3007 of RCRA, 42 U S C § 6927
- 29 If this certification is subsequently determined to be false, such AOC III Respondent shall forfeit all payments made pursuant to Section VIII of this Consent Order. Such forfeiture shall not constitute liquidated damages and shall not in any way foreclose the United States' right to pursue any other causes of action arising from such AOC III Respondent's false certification. Providing false, fictitious, or fraudulent statements or representations to the United States is punishable as a crime under 18 U S C § 1001.

#### **XI COVENANT NOT TO SUE BY UNITED STATES**

- 30 In consideration of the payments that will be made by the AOC III Respondents under the terms of this Consent Order, and except as specifically provided in Section XII (Reservations of Rights by United States), the United States covenants not to sue or take administrative action against any of the AOC III Respondents for civil liability for reimbursement of Response Costs or for injunctive relief pursuant to Sections 106 or 107 of CERCLA, 42 U S C §§ 9606 or 9607, or for injunctive relief pursuant to Section 7003 of the RCRA, 42 U S C § 6973, with regard to the Site. With respect to present and future liability, this covenant not to sue shall take effect for each AOC III Respondent upon receipt of that AOC III Respondent's payment as required by Section VIII. With respect to each AOC III Respondent, individually, these covenants are conditioned upon complete performance by such AOC III Respondent of all obligations under this Consent Order, and the veracity and completeness of the information provided to EPA by such AOC III Respondent relating to each AOC III Respondent's involvement with the Site. These covenants shall be null and void with respect to any individual AOC III Respondent that fails to perform all obligations under this Consent Order in a timely and complete manner, or has provided materially false, incomplete, or incorrect information in such AOC III Respondent's Certification under Section X of this Consent Order. These covenants extend only to AOC III Respondents and do not extend to any other person.

#### **XII RESERVATIONS OF RIGHTS BY UNITED STATES**

- 31 The United States expressly reserves, and nothing in this Consent Order is intended to be nor shall it be construed as a release or covenant not to sue for, any claim or cause of action, administrative or judicial, civil or criminal, past or future, at law or in equity, which the United States, including EPA, may have against any of the AOC III Respondents for

- a any liability as a result of failure to make the payment required by Section VIII (Payment by AOC III Respondents), or otherwise comply with the terms of this Consent Order,
- b liability arising from the past, present, or future disposal, release or threat of release of hazardous substances at any facility, as defined in Section 101(9) of CERCLA, 42 U S C § 9601(9), other than the Site,
- c any matters not expressly included in Section XI above (Covenant Not to Sue by the United States),
- d liability for damages for injury to, destruction of or loss of natural resources, and for the costs of any natural resource damage assessments,
- e liability for response costs relating to the Site that have been or may be incurred by Natural Resource trustees, including, but not limited to, the Department of Interior, of the United States,
- f criminal liability,
- g liability of any AOC III Respondent for violations of federal or state law, or
- h any liability for Remedial Costs in excess of \$31.2 million

32 Nothing in this Consent Order constitutes a covenant not to sue or to take action or otherwise limits the ability of the United States to seek or obtain further relief from any AOC III Respondent, and the covenant not to sue set forth above and the contribution protection provided below will become null and void as to any individual AOC III Respondent, if

- a such AOC III Respondent contributed more than 0.75% of the total volume of the hazardous substances at the Site or contributed to the Site hazardous substances which contributed disproportionately to the cumulative toxic or other hazardous effects of the hazardous substances at the Site,
- b such AOC III Respondent fails to make a payment under the terms of this Consent Order, and/or,
- c such AOC III Respondent's certification in Section X of this Order is false or materially inaccurate

**XIII COVENANT NOT TO SUE BY RESPONDENTS**

- 33 AOC III Respondents covenant not to sue and agree not to assert any claims or causes of action against the United States or its contractors or employees with respect to the Site or this Consent Order including, but not limited to
- a Any direct or indirect claim for reimbursement from the EPA Hazardous Substance Superfund based on Sections 106(b)(2), 107, 111, 112, or 113 of CERCLA, 42 U S C §§ 9606(b)(2), 9607, 9611, 9612, or 9613, or any other provision of law,
  - b any claims arising out of response activities at the Site, and
  - c any claim against the United States pursuant to Sections 107 and 113 of CERCLA, 42 U S C §§ 9607 and 9613, relating to the Site
- 34 Nothing in this Consent Order shall be deemed to constitute preauthorization or approval of a claim within the meaning of Section 111 of CERCLA, 42 U S C § 9611, or 40 C F R § 300.700(d)

**XIV EFFECT OF SETTLEMENT/CONTRIBUTION PROTECTION**

- 35 Nothing in this Consent Order shall be construed to create any rights in, or grant any cause of action to, any person not a party to this Consent Order. The preceding sentence shall not be construed to waive or nullify any rights that any person not a signatory to this Consent Order may have under applicable law. The United States and the AOC III Respondents each reserve any and all rights (including, but not limited to, any right to contribution), defenses, claims, demands, and causes of action which each party may have with respect to any matter, transaction, or occurrence relating in any way to the Site against any person not a party hereto.
- 36 EPA and the AOC III Respondents agree that the actions undertaken by AOC III Respondents in accordance with this Consent Order do not constitute an admission of any liability by any AOC III Respondent. The AOC III Respondents do not admit, and retain the right to controvert in any subsequent proceedings, other than proceedings brought by the United States to implement or enforce this Consent Order, the validity of the Statement of Facts or Determinations contained in this Consent Order.
- 37 The AOC III Respondents agree that with respect to any suit or claim for contribution brought by them for matters related to this Consent Order they will provide notification to EPA in writing no later than sixty (60) days prior to the

initiation of such suit or claim. The AOC III Respondents also agree that with respect to any suit or claim for contribution brought against them for matters related to this Consent Order they will provide notification to EPA in writing within ten (10) days of service of the complaint on them. In addition, AOC III Respondents shall notify EPA within ten (10) days of receipt of any order from a court setting any such case for trial.

- 38 In any subsequent administrative or judicial proceeding initiated by the United States for injunctive relief, recovery of response costs, or other appropriate relief relating to the Site, AOC III Respondents shall not assert, and may not maintain, any defense or claim based upon the principles of waiver, res judicata, collateral estoppel, issue preclusion, claim-splitting, or other defenses based upon any contention that the claims raised by the United States in the subsequent proceeding were or should have been brought in the instant case, provided, however, that nothing in this Paragraph affects the enforceability of the covenants not to sue set forth in Section XI (Covenants Not to Sue by the United States).
- 39 Subject to the Reservation of Rights in Section XII of this Order, each AOC III Respondent, by entering into and complying with the terms of this Consent Order, is entitled to protection from contribution actions or claims as provided by Sections 113(f)(2) and 122(g)(5) of CERCLA, 42 U.S.C. §§ 9613(f)(2) and 9622(g)(5), for "matters addressed" in this Consent Order. The "matters addressed" in this Consent Order are all response actions taken by the United States and by private parties, and all response costs incurred and to be incurred by the United States and by private parties, at or in connection with the Site. The "matters addressed" in this settlement do not include those response costs or response actions as to which the United States has reserved its rights under this Consent Order (except for claims for failure to comply with this Consent Order), in the event that the United States asserts rights against AOC III Respondents coming within the scope of such reservations.

## **XV OPPORTUNITY FOR PUBLIC COMMENT**

- 40 This Consent Order shall be subject to a thirty-day public comment period pursuant to Section 122(i) of CERCLA, 42 U.S.C. § 9622(i), and Section 7003(d) of RCRA, 42 U.S.C. § 6973(d). EPA shall provide notice, and an opportunity for a public meeting in the affected area on the proposed settlement in accordance with Section 7003(d) of RCRA, 42 U.S.C. § 6973(d). In accordance with Section 122(i)(3) of CERCLA, 42 U.S.C. § 9622(i)(3), EPA may withdraw or withhold its consent to this Consent Order if comments received disclose facts or considerations which indicate that this Consent Order is inappropriate, improper or inadequate.

**XVI. ATTORNEY GENERAL APPROVAL**

- 41 In accordance with Section 122(g)(4) of CERCLA, this Consent Order shall not become effective without the prior written approval of the Attorney General or his designee

**XVII. COSTS AND FEES**

- 42 AOC III Respondents shall bear their own costs and attorney's fees regarding this matter. Nothing in this Consent Order shall be construed to create any rights in, or grant any cause of action to, any person not a Party to this Consent Order. The United States and AOC III Respondents each reserve any and all rights (including, but not limited to, any right to contribution), defenses, claims, demands, and causes of action which each Party may have with respect to any matter, transaction, or occurrence relating in any way to the Site against any person not a Party hereto

**XVIII. INTEGRATION/APPENDICES**

- 43 This Consent Order and its appendices constitute the final, complete and exclusive agreement and understanding among the Parties with respect to the settlement embodied in this Consent Order. The Parties acknowledge that there are no representations, agreements or understandings relating to the settlement other than those expressly contained in this Consent Order. The following appendices are attached to and incorporated into this Consent Order

"Appendix A" -- List of AOC III Respondents

"Appendix B" -- Map of the Site

"Appendix C-1" -- AOC I VRS

"Appendix C-2" -- AOC II VRS

"Appendix D" -- AOC III VRS

**XIX. EFFECTIVE DATE**

- 44 The effective date of this Consent Order shall be the date upon which EPA issues written notice to AOC III Respondents that the public comment period pursuant to Paragraph 40 has closed and that comments received, if any, do not require modification of or EPA withdrawal from this Consent Order



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In the Matter of Malvern TCE Superfund Site  
Administrative Order on Consent for *De Minimis* Settlement,  
U S EPA Docket No CERC-03-2003-0041

IT IS SO AGREED AND ORDERED

U S Environmental Protection Agency

By \_\_\_\_\_  
Donald S Welsh  
Regional Administrator  
Region III

\_\_\_\_\_  
Date

THE UNDERSIGNED RESPONDENT enters into this Administrative Order on Consent for *De Minimis* Settlement, U S EPA Docket No CERC-03-2003-0041, relating to the Malvern TCE Superfund Site, 258 N Phoenixville Pike, Malvern, Pennsylvania

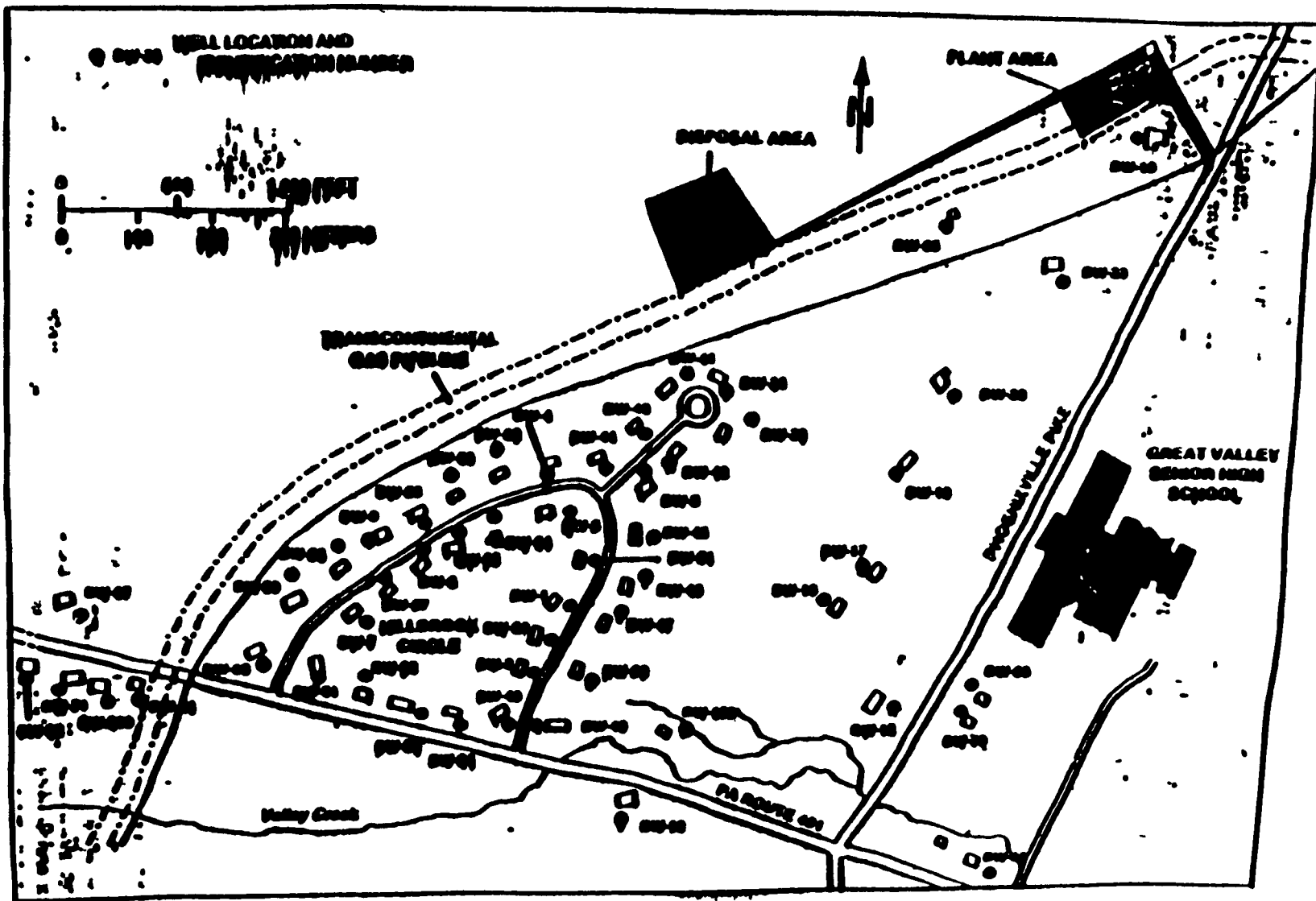
FOR RESPONDENT \_\_\_\_\_  
[Name]

\_\_\_\_\_  
[Address]

By \_\_\_\_\_  
[Signature] [Date]

\_\_\_\_\_  
[Type name and Title]

**Appendix B**  
**Site Map**



HALVERM TCE SITE MAP

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## Appendix C-1 AOC I VRS

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**Malvern TCE Superfund Site  
Explanation Sheet for the Final Volumetric Ranking Summary (VRS)**

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site (the Site) Final Volumetric Ranking Summary (VRS). Please refer to the example provided below for an illustration of the process used to calculate individual total payment<sup>1</sup>.

PRP Name	FDA Drums	FDA %	FDA Revised %	FDA Cost	FDA Premium	MPA Drums	MPA %	MPA Revised %	MPA Cost	MPA Premium	Total Payment
ABC Corporation	34	1.49 %	1.52 %	\$141,249	\$62,182	82	0.29 %	0.30 %	\$26,325	\$11,483	\$241,239

**PRP Name** = The name of the specific potentially responsible party (PRP). Subsidiaries may be listed separately from parent companies, therefore please review the VRS in its entirety to identify company subsidiaries that may have done business with Chemcene Corporation.

**FDA Drums** = The total number for drums sent to the Site before August 1, 1975

**FDA %** = The total number of drums sent by the PRP prior to August 1, 1975, divided by the total number of documented drums received by Chemcene Corporation prior to August 1, 1975 multiplied by 100.

**FDA Revised %** = The total number of drums sent by the PRP prior to August 1, 1975 divided by the FDA total number of all non-orphan<sup>2</sup> drums received by Chemcene Corporation prior to August 1, 1975, multiplied by 100

**FDA Cost** = The FDA Revised % divided by 100 and multiplied by \$9,263,078, the total past cost<sup>3</sup> and estimated future cost associated with the FDA

**FDA Premium** = The FDA Revised % divided by 100 and multiplied by the future estimated costs for the FDA (\$8,155,725) multiplied by the premium (50%)

**MPA Drums** = The total number of drums received at the Site, regardless of the date, for which the PRP is responsible

**MPA %** = The total number of drums sent by the PRP, regardless of date, divided by the total number of documented drums received by Chemcene Corporation, multiplied by 100.

**MPA Revised %** = The total number of drums sent by the PRP, regardless of date, divided by the total number of non-orphan drums<sup>2</sup> received by Chemcene Corporation, regardless of date, multiplied by 100.

**MPA Cost** = MPA Revised % divided by 100 and multiplied by \$8,680,799, the total past cost<sup>3</sup> and estimated future cost associated with the MPA.

**MPA Premium** = The MPA Revised % divided by 100 and multiplied by the future estimated costs for the MPA (\$7,573,426) multiplied by the premium (50%)

**Total Payment** = FDA Cost + FDA Premium + MPA Cost + MPA Premium

<sup>1</sup> The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. The full number is used in the calculation of the Total Payment.

<sup>2</sup> Non-orphan drums are drums for which there is either a viable generator or a viable broker/transporter

<sup>3</sup> The total past cost for the Site as of June 17, 1997, is \$2,214,705.00. Half of this cost was allocated to the FDA with the other half being allocated to the MPA.

**Malvern TCE S Fund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Western Electric	139.00	6.08%	6.22%			2083.00	7.54%	7.50%			A
Hamilton Technology Inc						1234.00	4.47%	4.62%			A
Simon Wrecking Company Inc	715.51	31.33%	32.00%			983.51	3.58%	3.68%			A
Hamilton Watch Co	197.00	8.63%	8.81%			904.00	3.27%	3.38%			A
Viz Manufacturing	104.00	4.53%	4.65%			819.54	2.97%	3.07%			A
Flecher & Porter Co/Andrews Glass	93.00	4.07%	4.18%			794.50	2.88%	2.98%			A
Syntex/Star Grouping											
Star Dental Corporation						610.00	2.21%	2.28%			D, A
Plymouth Tube	9.00	0.38%	0.40%			586.37	2.05%	2.12%			A
Armstrong Cork Co						522.70	1.88%	1.96%			A
Burroughs Corp	147.00	6.44%	6.58%			519.54	1.88%	1.95%			A
General Motors Corporation	5.00	0.22%	0.22%			517.00	1.87%	1.94%			A
Cypress Foote Mineral Co						495.00	1.79%	1.85%			A
Resource Technology Services, Inc.						473.72	1.72%	1.77%			C, A
Hamilton Precision Metals						472.08	1.71%	1.77%			A
Retty Pitting						430.00	1.58%	1.61%			A
LaFrance Corp	12.00	0.53%	0.54%			415.00	1.50%	1.55%			A
N W Controls	4.00	0.18%	0.18%			374.59	1.38%	1.40%			A
Sunco Corp.	52.00	2.26%	2.33%			358.00	1.30%	1.34%			A
Morning Call						355.00	1.29%	1.33%			A
Delber Products						328.50	1.18%	1.23%			A
USG Grouping											
Donn Corporation						292.00	1.08%	1.09%			D, A

\* Superseding 4/27/96 VRS

A De minimis party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D If your company appears under a grouping, please refer to the combined entries throughout the alphabetical Volumetric Ranking Summary

E De minimis party

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11/30/98

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

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Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Kim Manufacturing						283.00	1.03%	1.08%			A
ALCOA	40.00	1.75%	1.79%			275.00	1.00%	1.03%			A
Quaker City Chemicals	7.00	0.31%	0.31%			268.00	0.97%	1.00%			C, A
P P & L Northern Div S C						257.27	0.83%	0.86%			A
Aydin						251.82	0.91%	0.94%			A
Bechtel Corporation						250.55	0.91%	0.94%			A
A. S. Koch Corp.	137.00	6.00%	6.13%			250.00	0.91%	0.94%			A
Vishay Resistive Systems						241.00	0.87%	0.90%			A
Handy & Harman Tube Co. Inc.						229.18	0.83%	0.86%			A
Porter Instruments						228.27	0.83%	0.85%			A
Electronic Display Systems/Hercules						224.00	0.81%	0.84%			A
Action Manufacturing Company	49.18	2.15%	2.20%			220.31	0.80%	0.83%			A
Cabot Grouping											
Kawachi Beryco						218.00	0.79%	0.82%			D, A
John Evan's & Sons, Inc.						203.29	0.74%	0.76%	\$66,069	\$26,829	\$92,898
Defense Reutilization & Marketing Grouping											
DRMS/PNSY						200.72	0.73%	0.75%			D, A
Electro Platers of York Inc.						199.36	0.72%	0.75%	\$64,811	\$26,272	\$91,083
McClarin Plastics						195.04	0.71%	0.73%	\$63,407	\$27,659	\$91,066
General Electric						191.00	0.69%	0.72%	\$62,094	\$27,088	\$89,182
Lavelle Aircraft Co.						189.55	0.69%	0.71%	\$61,822	\$26,881	\$88,703
Polysciences						184.00	0.67%	0.69%	\$59,818	\$26,094	\$85,912

\* Superceding 4/27/98 VRS

A De minimis party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D If your party appears under a grouping, please refer to the combined entries throughout the Malvern TCE Superfund Site Generator Volumetric Ranking Summary

E De minimis party



**Malvern TCE Superfund Site  
Generator Volumetric Ranking Summary\***  
(By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
<b>USG Grouping</b>											
U S G Interiors						182.00	0.66%	0.66%			D, A
R C A	32.00	1.40%	1.43%	\$132,584	\$58,367	177.00	0.64%	0.66%	\$57,542	\$25,101	\$273,584
S P S Technologies						167.00	0.60%	0.63%	\$54,291	\$23,663	\$77,974
National Solvents Inc.						156.00	0.57%	0.00%	\$0	\$0	B
H - V Industries, Inc.						151.60	0.55%	0.57%	\$49,252	\$21,465	\$70,737
Leeds & Northrop						145.72	0.53%	0.55%	\$47,373	\$20,665	\$68,038
N G K Metals						145.00	0.53%	0.54%	\$47,139	\$20,563	\$67,702
<b>Cabot Grouping</b>											
Cabot Berylo						143.00	0.52%	0.54%			D, A
Stein Seal Co.						138.00	0.50%	0.52%	\$41,663	\$19,570	\$64,434
S K F Industries Inc						133.36	0.48%	0.50%	\$43,355	\$18,912	\$62,267
Amp Corp.	34.00	1.49%	1.52%	\$140,670	\$62,015	133.00	0.48%	0.50%	\$43,239	\$18,661	\$264,984
Bishop Tube Co.	60.00	2.63%	2.66%	\$246,594	\$109,436	130.00	0.47%	0.49%	\$42,263	\$18,436	\$416,731
F B F Industries Inc.						130.00	0.47%	0.49%	\$42,263	\$18,436	\$60,696
Parflex Inc.	42.00	1.64%	1.66%	\$174,016	\$76,607	126.31	0.45%	0.47%	\$40,736	\$17,771	\$309,131
Valley Forge Tape & Label Co.						122.36	0.44%	0.46%	\$39,779	\$17,352	\$57,131
Dorado Fabrica						119.00	0.43%	0.00%	\$0	\$0	B
Penguin Industries						119.00	0.43%	0.45%	\$36,667	\$16,676	\$55,562
R & E Martin, Inc.						116.29	0.42%	0.44%			C
<b>Synlex/Star Grouping</b>											
Synlex Dental Products						115.00	0.42%	0.43%			D, A
James Spring & Wire Co.	2.00	0.09%	0.09%	\$8,266	\$3,646	113.00	0.41%	0.42%	\$36,736	\$16,025	\$64,695

\* Superseding 4/27/88 VRS

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D If your company appears under a grouping, please refer to the combined entries throughout the alphabetical Volumetric Ranking Summary

E De minimis party

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11/30/98

**Malvern TCE Superfund Site  
Generator Volumetric Ranking Summary\***  
(By Descending Order)

Page 4 of 16

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Giles & Ransome						112.00	0.41%	0.42%	\$36,411	\$15,883	\$52,294
Mars Electronics Inc.						110.98	0.40%	0.42%	\$36,083	\$15,740	\$51,822
Netzach Inc.						110.00	0.40%	0.41%	\$35,781	\$15,589	\$51,380
Waste Conversion						104.00	0.38%	0.39%			C
Empire Abrasive & Equipment Corp						103.80	0.38%	0.39%	\$33,745	\$14,720	\$48,465
McGee Industries Inc.						97.00	0.35%	0.36%	\$31,534	\$13,756	\$45,290
K D Tool Manufacturing						95.00	0.34%	0.36%	\$30,884	\$13,472	\$44,357
Matco						94.04	0.34%	0.35%	\$30,572	\$13,336	\$43,908
S P D Technologies						87.00	0.32%	0.33%	\$28,284	\$12,338	\$40,621
Acro Labels						86.00	0.31%	0.32%	\$27,958	\$12,196	\$40,154
J W Rex Co	21.00	0.92%	0.94%	\$67,008	\$38,303	86.00	0.31%	0.32%	\$27,958	\$12,196	\$185,468
Chobart Associates						85.15	0.31%	0.32%	\$27,882	\$12,075	\$39,757
High Energy Company						84.84	0.31%	0.32%	\$27,516	\$12,003	\$39,519
Container Research Corporation						83.00	0.30%	0.31%	\$26,983	\$11,771	\$38,754
Clifton Precision	34.00	1.48%	1.52%	\$140,870	\$82,015	82.00	0.30%	0.31%	\$26,958	\$11,828	\$241,172
Materials Electronic Products						81.00	0.29%	0.30%	\$26,333	\$11,487	\$37,820
Prince Instruments Inc.						79.00	0.29%	0.30%	\$25,883	\$11,203	\$36,886
Aston-Hill Co.						74.00	0.27%	0.00%	\$0	\$0	B
Defense Reutilization & Marketing Grouping											
DRMO Knox						74.00	0.27%	0.28%			D, A
Moore Products	73.00	3.20%	3.27%	\$302,458	\$133,150	73.00	0.26%	0.27%	\$23,732	\$10,352	\$468,801
Spra-Fin Inc.						72.41	0.26%	0.27%	\$23,540	\$10,289	\$33,809
USG Grouping											
Floor Systems Inc.						71.40	0.26%	0.27%			D, A

\* Superseding 4/27/98 VRS

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D If you [ ] appears under a grouping, please refer to the combined entities throughout the [ ] Volumetric Ranking Summary

E De minimis party

**Malvern TCE Fund Site  
Generator Volumetric Ranking Summary\***  
(By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Superior Tube	21.00	0.92%	0.94%	\$87,008	\$38,303	71.00	0.26%	0.27%	\$23,082	\$10,069	\$158,482
Synthane Taylor Corp.						71.00	0.26%	0.27%	\$23,082	\$10,069	\$33,151
Sandvik, Inc.						70.90	0.26%	0.27%	\$23,049	\$10,065	\$33,104
Amchem						70.00	0.25%	0.26%	\$22,757	\$9,927	\$32,684
Scotco Design Group Inc.						69.00	0.25%	0.26%	\$22,432	\$9,785	\$32,217
Gould Inc.						68.00	0.25%	0.26%	\$22,107	\$9,643	\$31,750
Nepp Chemical						67.00	0.24%	0.25%	\$21,782	\$9,502	\$31,283
Globe Solvents						66.36	0.24%	0.00%	\$0	\$0	B
Continental Vanguard, Inc.						65.45	0.24%	0.25%			C
Zenith Products Corp.						63.00	0.23%	0.24%	\$20,481	\$8,834	\$29,415
Elco Corporation	61.00	2.67%	2.73%	\$252,738	\$111,262	61.00	0.22%	0.23%	\$19,831	\$8,651	\$392,481
Welox Inc.						61.00	0.22%	0.23%	\$19,831	\$8,651	\$28,482
North Industrial Chemicals						60.00	0.22%	0.22%			C
Graphic Packaging Corp.						59.57	0.22%	0.22%	\$19,366	\$8,446	\$27,814
Superior Metal Products						58.00	0.21%	0.22%	\$18,858	\$8,225	\$27,081
Mide Development						57.50	0.21%	0.22%	\$18,693	\$8,154	\$26,847
Solitario						57.00	0.21%	0.00%	\$0	\$0	B
Defense Reutilization & Marketing Grouping											
DRMO PHILADELPHIA						54.00	0.20%	0.20%			D, A
Simonetta Brothers						53.26	0.19%	0.00%	\$0	\$0	B
North Penn Polishing & Plating						52.55	0.19%	0.20%	\$17,084	\$7,452	\$24,536
Ark Products	5.00	0.22%	0.22%	\$20,716	\$9,120	52.00	0.19%	0.19%	\$16,905	\$7,374	\$54,115
East West Label Co. Inc.						49.50	0.18%	0.19%	\$16,092	\$7,020	\$23,112
Delco Wire & Cable Inc./ Delco Elec						47.00	0.17%	0.00%	\$0	\$0	B

\* Superceding 4/27/88 VRS

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E De minimis party

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11/30/98

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Page 6 of 16

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Pitman Corp.						47.00	0.17%	0.18%	\$15,280	\$6,665	\$21,945
M Q S Inspection Inc./Magnaflux						46.00	0.17%	0.17%	\$14,954	\$6,523	\$21,478
A & L Handles						43.00	0.16%	0.16%	\$13,979	\$6,098	\$20,077
J & J Spill						43.00	0.16%	0.16%			C, A
Lancaster Machinery Co						43.00	0.16%	0.16%	\$13,979	\$6,098	\$20,077
Ametek, Inc.	9.00	0.39%	0.40%	\$37,289	\$16,416	42.18	0.15%	0.16%	\$13,713	\$5,962	\$73,399
Athens Controls						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Biddle Instrument Company						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Cook Specialty Company						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
USG Grouping											
Davey Products						41.00	0.15%	0.15%			D, A
Adelphia Graphics Systems						40.05	0.15%	0.15%	\$13,020	\$5,660	\$18,700
C S S International Corp	8.00	0.35%	0.36%	\$33,146	\$14,582	39.86	0.14%	0.15%	\$12,958	\$5,653	\$68,349
Cham Par						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Formosa Plastics						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Xynatech Inc.						39.00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Easton	36.00	1.56%	1.61%	\$140,157	\$65,663	38.00	0.14%	0.14%	\$12,354	\$5,389	\$232,562
Asplundh Manufac. Co.						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Brumbaugh Industries						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Carvel Hall Inc						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Menorgraphics						36.84	0.13%	0.14%	\$11,977	\$5,224	\$17,201
Allstar Mfg.						36.00	0.13%	0.13%	\$11,704	\$5,105	\$16,809
Declason Data						36.00	0.13%	0.13%	\$11,704	\$5,105	\$16,809
Petrocon	35.00	1.53%	1.57%	\$145,013	\$63,839	35.00	0.13%	0.13%	\$11,378	\$4,963	\$225,194

\* Superseding 4/27/98 VRS

A De minimis party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D If your party appears under a grouping, please refer to the combined entities throughout the Malvern TCE Superfund Site Generator Volumetric Ranking Summary

E De minimis party

AR000217

11/30/

**Malvern TCE S Fund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

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Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Phila. Electric Co. Oregon Maint. Shops						34.45	0.12%	0.13%	\$11,200	\$4,865	\$16,065
Accuracy Scientific	300	0.13%	0.13%	\$12,430	\$5,472	34.18	0.12%	0.13%	\$11,112	\$4,847	\$33,661
Electrolay						33.00	0.12%	0.12%	\$10,728	\$4,680	\$15,408
Specialty Coatings Inc.						33.00	0.12%	0.12%	\$10,728	\$4,680	\$15,408
Control Switch	300	0.13%	0.00%	\$0	\$0	32.48	0.12%	0.00%	\$0	\$0	B
B P Oil						32.00	0.12%	0.12%	\$10,403	\$4,538	\$14,941
Pennsbury Manufacturing						32.00	0.12%	0.00%	\$0	\$0	B
Solid State Scientific						32.00	0.12%	0.12%	\$10,403	\$4,538	\$14,941
Trend Instruments						31.18	0.11%	0.12%	\$10,137	\$4,422	\$14,558
Heel Co						31.00	0.11%	0.12%	\$10,078	\$4,398	\$14,474
Display Corporation of America						30.00	0.11%	0.11%	\$9,753	\$4,254	\$14,007
Telegenix Inc.						30.00	0.11%	0.11%	\$9,753	\$4,254	\$14,007
Johnson-Matthey						29.55	0.11%	0.11%	\$9,607	\$4,191	\$13,797
Laminators Inc						29.00	0.11%	0.11%	\$9,428	\$4,113	\$13,540
Westcode Inc.						28.22	0.10%	0.11%	\$9,174	\$4,002	\$13,176
Anchor Darling Co						28.00	0.10%	0.10%	\$9,103	\$3,971	\$13,074
G K. Garrett Corp						27.45	0.10%	0.10%	\$8,924	\$3,893	\$12,817
Cabot Grouping											
Cabot Wrought Products						27.00	0.10%	0.10%			D, A
Jetshaper Inc						27.00	0.10%	0.10%	\$8,778	\$3,829	\$12,607
R R. Donnelley & Sons Inc						27.00	0.10%	0.10%	\$8,778	\$3,829	\$12,607
Kawneer Corp.						26.00	0.09%	0.10%	\$8,453	\$3,667	\$12,140
London Harness & Cable Co						26.00	0.09%	0.10%	\$8,453	\$3,667	\$12,140
Storm Weather Products						26.00	0.09%	0.10%	\$8,453	\$3,667	\$12,140

\* Superseding 4/27/98 VRS

A De minimis party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D If your company appears under a grouping, please refer to the combined entries throughout the alphabetical Volumetric Ranking Summary

E De minimis party

AR000218

ORIGINAL

11/30/98

**Malvern TCE Superfund Site  
Generator Volumetric Ranking Summary\*  
(By Descending Order)**

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Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Accumetrix						25.00	0.00%	0.00%	\$8,127	\$3,545	\$11,673
Model Finishing						25.00	0.00%	0.00%	\$8,127	\$3,545	\$11,673
Sweda/Liton						25.00	0.00%	0.00%	\$8,127	\$3,545	\$11,673
Frazer Volpe Corporation						23.82	0.00%	0.00%	\$7,744	\$3,378	\$11,122
Amunee Mfg. Co						23.00	0.08%	0.08%	\$7,477	\$3,282	\$10,739
Gas Springs						23.00	0.08%	0.08%	\$7,477	\$3,282	\$10,739
R D L Inc						23.00	0.08%	0.08%	\$7,477	\$3,282	\$10,739
Westinghouse						23.00	0.08%	0.08%	\$7,477	\$3,282	\$10,739
Beamer Engineering	4.00	0.18%	0.18%	\$18,573	\$7,286	22.00	0.08%	0.08%	\$7,152	\$3,120	\$34,141
Sandtru Company						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Camdal Metals						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Data Media Inc						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Philadelphia Rust Proof Co. Inc						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
United Chem-Con Corp						21.00	0.08%	0.00%	\$0	\$0	B
Matheson Instrument						20.10	0.07%	0.08%	\$6,534	\$2,850	\$9,385
Carlot Inc.						20.00	0.07%	0.08%	\$6,531	\$2,849	\$9,380
Contamination Control, Inc.						20.00	0.07%	0.07%	\$6,502	\$2,836	\$9,338
Mitchell Specialty						20.00	0.07%	0.00%	\$0	\$0	B
Narco Avionics						19.00	0.07%	0.07%	\$6,177	\$2,694	\$8,871
U S Electronic Services Corp.	19.00	0.83%	0.00%	\$0	\$0	19.00	0.07%	0.00%	\$0	\$0	B
Deltron Incorporated						18.55	0.07%	0.07%	\$6,031	\$2,631	\$8,661
Kulich & Sofia						18.54	0.07%	0.07%	\$6,027	\$2,629	\$8,657
Yubas-Exide Battery Corp.						18.13	0.07%	0.07%	\$5,894	\$2,571	\$8,465
David K. Robson, Inc						18.00	0.07%	0.07%	\$5,852	\$2,553	\$8,404
Silvane Co.						18.00	0.07%	0.07%	\$5,852	\$2,553	\$8,404
Airworks						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937

\* Superseding 4/27/96 VRS

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E De minimis party

**Malvern TCE Site  
Generator Volumetric Ranking Summary\***  
(By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
C K Systematics, Inc						17.00	0.00%	0.00%	\$5,527	\$2,411	\$7,937
Cobra Wire & Cable Co						17.00	0.00%	0.00%	\$5,527	\$2,411	\$7,937
Oxford Metal Products						17.00	0.00%	0.00%	\$5,527	\$2,411	\$7,937
Pennwell Corp						17.00	0.00%	0.00%	\$5,527	\$2,411	\$7,937
Transducer Systems Inc						17.00	0.00%	0.00%	\$5,527	\$2,411	\$7,937
Simpson Sign Co						16.62	0.00%	0.00%	\$0	\$0	B
C W Industries						16.04	0.00%	0.00%	\$5,215	\$2,275	\$7,489
Mide Manufacturing	8.00	0.35%	0.00%	\$0	\$0	16.00	0.00%	0.00%	\$0	\$0	B
National Metal Crafters						16.00	0.00%	0.00%	\$5,202	\$2,269	\$7,471
Olympic Tool & Machine Co						16.00	0.00%	0.00%	\$5,202	\$2,269	\$7,471
Piste Crafters Inc						16.00	0.00%	0.00%	\$5,202	\$2,269	\$7,471
Sharples Inc.						16.00	0.00%	0.00%	\$5,202	\$2,269	\$7,471
Diversified Electronic Corp						15.83	0.00%	0.00%	\$5,049	\$2,202	\$7,251
Penn Albion Product						15.31	0.00%	0.00%	\$4,977	\$2,171	\$7,148
Aero Plating						15.00	0.05%	0.00%	\$0	\$0	B
Concurrent Computer Corp						15.00	0.05%	0.00%	\$4,876	\$2,127	\$7,004
Gateway Terminal						15.00	0.05%	0.00%	\$4,876	\$2,127	\$7,004
Penn Dye & Finishing						15.00	0.05%	0.00%	\$4,876	\$2,127	\$7,004
Sonic Instruments						15.00	0.05%	0.00%	\$4,876	\$2,127	\$7,004
Classic Coachworks						14.00	0.05%	0.05%	\$4,551	\$1,965	\$6,537
Hurst Part.						14.00	0.05%	0.05%	\$4,551	\$1,965	\$6,537
Repco	9.00	0.30%	0.00%	\$0	\$0	14.00	0.05%	0.00%	\$0	\$0	B
Technical Products						14.00	0.05%	0.05%	\$4,551	\$1,965	\$6,537
Boekel Industries						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Bunnell Plastics Inc						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070

\* Superseding 4/27/98 VRS

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E De minimis party

ORIGINAL

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ORIGINAL

11/30/98

**Malvern TCE Superfund Site  
Generator Volumetric Ranking Summary\***  
(By Descending Order)

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Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Cabot Grouping											
Cabot Company						13.00	0.05%	0.05%			D, A
Defense Reutilization & Marketing Grouping											
Madison, IN						13.00	0.05%	0.05%			D, A
E/M Corporation						13.00	0.05%	0.05%	\$4,228	\$1,844	\$6,070
Fabric Development						13.00	0.05%	0.05%	\$4,228	\$1,844	\$6,070
Imperial Specialty						13.00	0.05%	0.05%	\$4,228	\$1,844	\$6,070
Kosampal						13.00	0.05%	0.05%	\$4,228	\$1,844	\$6,070
Bo Peep Cleaners						12.63	0.05%	0.05%	\$4,108	\$1,791	\$5,897
Connecticut Mixed						12.00	0.04%	0.00%	\$0	\$0	B
Crown Marketing Equipment Co.						12.00	0.04%	0.04%	\$3,901	\$1,702	\$5,603
Formation Inc.						12.00	0.04%	0.04%	\$3,901	\$1,702	\$5,603
K S O Industries						12.00	0.04%	0.00%	\$0	\$0	B
Meck Wayne Plastics						12.00	0.04%	0.00%	\$0	\$0	B
Techalloy Inc.						11.67	0.04%	0.04%	\$3,794	\$1,655	\$5,449
Norco Finishing						11.00	0.04%	0.04%	\$3,576	\$1,560	\$5,136
Photolastic Inc.	11.00	0.48%	0.48%	\$45,578	\$20,064	11.00	0.04%	0.04%	\$3,576	\$1,560	\$70,775
U.S. A Ardee						11.00	0.04%	0.04%	\$3,576	\$1,560	\$5,136
Delta Flag Co.						10.22	0.04%	0.04%	\$3,322	\$1,448	\$4,772
Ames Supply						10.00	0.04%	0.00%	\$0	\$0	B
Neutronics						10.00	0.04%	0.04%	\$3,251	\$1,418	\$4,669
Ponderosa Disposal Co.						10.00	0.04%	0.00%			C, B
Techniford	10.00	0.44%	0.45%	\$41,432	\$18,240	10.00	0.04%	0.04%	\$3,251	\$1,418	\$64,341
A I W Frank						9.92	0.04%	0.00%	\$0	\$0	B
Aglar, Div. of Air Buensod, Inc.						9.00	0.03%	0.00%	\$0	\$0	B

\* Superseding 4/27/98 VRS

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D If your party appears under a grouping, please refer to the combined entities throughout the Malvern TCE Superfund Site Volumetric Ranking Summary

E De minimis party



11/30/

**Malvern TCE Site Fund Site  
Generator Volumetric Ranking Summary\***  
(By Descending Order)

Page 11 c

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
American Electronics Laboratories						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Delaware Container Co. Inc.						9.00	0.03%	0.00%	\$0	\$0	B
DeVries, Inc.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Hahn Truck Sales						9.00	0.03%	0.00%	\$0	\$0	B
Prodelin Inc.						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Reynolds Metals						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Sprague-Griffiths Div						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Suntrop Industries	9.00	0.39%	0.00%	\$0	\$0	9.00	0.03%	0.00%	\$0	\$0	B
Victuals Company of America						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Elleco						8.36	0.03%	0.03%	\$2,716	\$1,186	\$3,903
Defense Reutilization & Marketing Grouping											
Picatinny Arsenal						8.26	0.03%	0.03%			D, A
Dentronix, Inc.						8.04	0.03%	0.03%	\$2,614	\$1,140	\$3,754
A & J Screw Machine Products						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Berg Laboratories						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Dreierbrook Engineering						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Fairfax Cleaners						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Moede Packaging						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Penske V.D.A.						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Photofabrication Chem. & Equip.						7.19	0.03%	0.03%	\$2,337	\$1,020	\$3,357
Herman Goldner Co. Inc.						7.09	0.03%	0.03%	\$2,305	\$1,005	\$3,310
Bilgram Gear Company						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Fendt Finding Co. Inc.						7.00	0.03%	0.00%	\$0	\$0	B
Giltech Inc.						7.00	0.03%	0.00%	\$0	\$0	B

\* Superseding 4/27/96 VRS

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D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary

E De minimis party

AR000222

ORIGINAL

ORIGINAL

11/30/98

**Malvern TCE Superfund Site  
Generator Volumetric Ranking Summary\***  
(By Descending Order)

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Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Hollingsworth						7.00	0.03%	0.03%	\$2,276	\$693	\$3,268
Iron Bound Heat Treating Co.						7.00	0.03%	0.03%	\$2,276	\$693	\$3,268
Krautkramer-Branson, Inc.						7.00	0.03%	0.03%	\$2,276	\$693	\$3,268
Met Fin	7.00	0.31%	0.31%	\$29,003	\$12,768	7.00	0.03%	0.03%	\$2,276	\$693	\$45,039
Shur-Kal Supply Corp.						7.00	0.03%	0.03%	\$2,276	\$693	\$3,268
Silvite						7.00	0.03%	0.03%	\$2,276	\$693	\$3,268
Valley Forge Laboratories, Inc.						7.00	0.03%	0.03%	\$2,276	\$693	\$3,268
Chrono-Log Corporation						6.28	0.02%	0.02%	\$2,042	\$641	\$2,932
ADEC						6.00	0.02%	0.02%	\$0	\$0	\$0
Alle-Laval Separation, Inc.						6.00	0.02%	0.02%	\$1,951	\$651	\$2,601
Angelo						6.00	0.02%	0.02%	\$1,951	\$651	\$2,601
Coatings For Industry Inc.						6.00	0.02%	0.02%	\$1,951	\$651	\$2,601
Fluid Power Inc.						6.00	0.02%	0.02%	\$1,951	\$651	\$2,601
Franklin Mint						6.00	0.02%	0.02%	\$1,951	\$651	\$2,601
K S M Fastening Systems Division						6.00	0.02%	0.02%	\$1,951	\$651	\$2,601
Lovelin Corporation						6.00	0.02%	0.02%	\$1,951	\$651	\$2,601
Philco Ford	6.00	0.26%	0.27%	\$24,859	\$10,944	6.00	0.02%	0.02%	\$1,951	\$651	\$36,605
Semetal						6.00	0.02%	0.02%	\$1,951	\$651	\$2,601
Tele Dynamics						6.00	0.02%	0.02%	\$1,951	\$651	\$2,601
Ferguson						5.96	0.02%	0.02%	\$1,936	\$645	\$2,763
Boyetown Packing Co.						5.27	0.02%	0.02%	\$1,713	\$747	\$2,461
Brandt Corporation						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Controls Service & Engineering						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Dixon Industries Corp.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Ervin Crafts						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Green Tweed Co.						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335

\* Superceding 4/27/98 VRS

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E De minimis party

AR000223

11/30

**Malvern TCE S Fund Site  
Generator Volumetric Ranking Summary\***  
(By Descending Order)

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Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Honeywell Instruments						5.00	0.02%	0.02%	\$1,625	\$708	\$2,335
Pyco Inc						5.00	0.02%	0.02%	\$1,625	\$708	\$2,335
Reynolds Cleaners						5.00	0.02%	0.02%	\$1,625	\$708	\$2,335
Woodstream Corp						5.00	0.02%	0.02%	\$1,625	\$708	\$2,335
Simco Company Inc.						4.82	0.02%	0.02%	\$1,469	\$641	\$2,110
E I T Inc. Erlana Instrumentation Tech						4.51	0.02%	0.02%	\$1,408	\$640	\$2,108
Richard Hurst						4.08	0.01%	0.00%	\$0	\$0	B
Alkine Hydraulic Corporation						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
AMF Head Division						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Arco Corp						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Auto-Pack						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Chem Cell Corporation						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Doshier - Jarvis						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
E Hopkins Co						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Est -Corporal						4.00	0.01%	0.00%	\$0	\$0	B
Far East Foods						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Hale Pumps, Inc.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Keystone Transformer						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
McHugh Railroad Maint Equip Co						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Monitor Systems	4.00	0.18%	0.18%	\$16,573	\$7,298	4.00	0.01%	0.01%	\$1,300	\$567	\$25,736
Phillips & Jacob	4.00	0.18%	0.18%			4.00	0.01%	0.01%			C
S G L						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Sariven Labs						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Scott Paper Corp.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Solar Atmospheres						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Swede/Hugh Group						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868

\* Superseding 11/27/88 VRS

A De minimis party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D If your company appears under a grouping, please refer to the combined entries throughout the alphabetical Volumetric Ranking Summary

E De minimis party

AR000224

ORIGINAL

ORIGINAL

11/30/98

**Malvern TCE Superfund Site  
Generator Volumetric Ranking Summary\***  
(By Descending Order)

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Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
United Contamination Controls Inc.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Gala Industries						3.55	0.01%	0.01%	\$1,154	\$503	\$1,658
Shared Medical Systems						3.27	0.01%	0.01%	\$1,083	\$464	\$1,527
Sterling Fishman Co.						3.11	0.01%	0.01%	\$1,011	\$441	\$1,452
A. Johnson & Co. Inc.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Brooks Instrument						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Danco Tool & Mold Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
E M R Photoelectric						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Emeco	3.00	0.13%	0.13%	\$12,430	\$5,472	3.00	0.01%	0.01%	\$975	\$425	\$19,302
Frontier Chemical Waste Process						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Gish Bros., Inc.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
H & L Cleaners						3.00	0.01%	0.00%	\$0	\$0	B
L & S Tool and Machine Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Lincoln						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Matthew International						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Ni-Chro						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Peripheral Dynamics						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Pacmatic/Sytron Corp.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Precision Arts Mfg.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Singer Co.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Trosmar, Henry						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Wave Energy Systems						3.00	0.01%	0.00%	\$0	\$0	B
Wildnson Industries						3.00	0.01%	0.00%	\$0	\$0	B
Industrial Systems Design						2.64	0.01%	0.00%	\$0	\$0	B
Lowry's						2.55	0.01%	0.00%	\$0	\$0	B
R C Ketzling						2.50	0.01%	0.01%	\$813	\$355	\$1,167

\* Superseding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D If your party appears under a grouping, please refer to the combined entities throughout the Malvern TCE Superfund Site Generator Volumetric Ranking Summary

E De minimis party

RECEIVED

**Malvern TCE S Fund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Descending Order)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Peller Engraving Inc						2.04	0.01%	0.01%	\$653	\$264	\$934
Boeing Property						2.00	0.01%	0.01%	\$650	\$264	\$934
Brittany's Ltd.						2.00	0.01%	0.00%	\$0	\$0	B
Chem-Solv						2.00	0.01%	0.01%	\$650	\$264	\$934
Delmeco Mfg. Inc						2.00	0.01%	0.01%	\$650	\$264	\$934
Dynemic Services						2.00	0.01%	0.00%	\$0	\$0	B
Gulf & Western						2.00	0.01%	0.01%	\$650	\$264	\$934
Hufftronics						2.00	0.01%	0.01%	\$650	\$264	\$934
Johnson Company						2.00	0.01%	0.01%	\$650	\$264	\$934
P H L Inc						2.00	0.01%	0.01%	\$650	\$264	\$934
Paria Business Forms						2.00	0.01%	0.01%	\$650	\$264	\$934
Pepco Manufacturing Co						2.00	0.01%	0.01%	\$650	\$264	\$934
Peter Paul Cadbury Co						2.00	0.01%	0.01%	\$650	\$264	\$934
Sperry Univac						2.00	0.01%	0.01%	\$650	\$264	\$934
Thermoseal Glass Corporation						2.00	0.01%	0.01%	\$650	\$264	\$934
Albright Paper & Box Corp						1.11	0.00%	0.00%			E
Hough/Loew Associates						1.00	0.00%	0.00%			E
A. Dule Pyle						1.00	0.00%	0.00%			E
Ace Service Corp						1.00	0.00%	0.00%			E
Antenna Corp						1.00	0.00%	0.00%			E
Cincinnati Time						1.00	0.00%	0.00%			E
Devon Apparel						1.00	0.00%	0.00%			E
Dunewood						1.00	0.00%	0.00%			E
Electro Tech Systems Inc.						1.00	0.00%	0.00%			E
Fairchild Space Systems						1.00	0.00%	0.00%			E
HI Services Inc						1.00	0.00%	0.00%			E

\* Superseding 4/27/88 VRS

A De minimus party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D If your company appears under a grouping, please refer to the combined entities throughout the alphabetical Volumetric Ranking Summary

E De minimis party

ORIGINAL

11/30/98

**Malvern TCE Superfund Site  
Generator Volumetric Ranking Summary\*  
(By Descending Order)**

Page 16 of 16

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Mars Money Systems						1.00	0.00%	0.00%			E
National Computer Systems						1.00	0.00%	0.00%			E
National Products						1.00	0.00%	0.00%			E
Perkin-Elmer						1.00	0.00%	0.00%			E
Pocono Foundry Inc.						1.00	0.00%	0.00%			E
Schmidt Brewery Co.						1.00	0.00%	0.00%			E
Schramm Inc.						1.00	0.00%	0.00%			E
Specialty Glass Products						1.00	0.00%	0.00%			E
Tube Methods						1.00	0.00%	0.00%			E
Tudor Tech Inc.						1.00	0.00%	0.00%			E
Welding Co.						1.00	0.00%	0.00%			E
T R W Inc.						0.45	0.00%	0.00%			E
Budd Co.						0.36	0.00%	0.00%			E
Jensen, Homer						0.36	0.00%	0.00%			E
Willtronics						0.30	0.00%	0.00%			E
Ughman Drum Co.						0.27	0.00%	0.00%			C
Meck Electric						0.27	0.00%	0.00%			E
Chester County Intermediate Unit						0.07	0.00%	0.00%			E
Thomson Engineering Co.	0.02	0.00%	0.00%			0.02	0.00%	0.00%			E
<b>De Minimis Total:</b>	<b>673.00</b>	<b>26.00%</b>	<b>23.40%</b>	<b>\$2,168,827</b>	<b>\$668,267</b>	<b>8664.37</b>	<b>35.00%</b>	<b>33.51%</b>	<b>\$2,786,132</b>	<b>\$1,219,287</b>	<b>\$7,123,333</b>
<b>Total:</b>	<b>2281.71</b>	<b>100.00%</b>	<b>100.00%</b>			<b>27068.87</b>	<b>100.00%</b>	<b>100.00%</b>			

\* Superseding 4/27/98 VRS

A De minimis party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D If your party appears under a grouping, please refer to the combined entries throughout the Malvern TCE Superfund Site Generator Volumetric Ranking Summary

E De minimis party

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**Malvern TCB Superfund Site  
Explanation Sheet for the Final Volumetric Ranking Summary (VRS)**

The following provides an explanation of the information provided in the attached Malvern TCB Superfund Site (the Site) Final Volumetric Ranking Summary (VRS). Please refer to the example provided below for an illustration of the process used to calculate individual total payment.<sup>1</sup>

ERP Name	FDA Drums	FDA %	FDA Revised %	FDA Cost	FDA Premium	MPA Drums	MPA %	MPA Revised %	MPA Cost	MPA Premium	Total Payment
ABC Corporation	34	1.49 %	1.52 %	\$141,249	\$62,162	82	0.29 %	0.30 %	\$26,325	\$11,463	\$241,239

**ERP Name** = The name of the specific potentially responsible party (PRP). Subsidiaries may be listed separately from parent companies, therefore, please review the VRS in its entirety to identify company subsidiaries that may have done business with Chemdene Corporation.

**FDA Drums** = The total number for drums sent to the Site before August 1, 1975

**FDA %** = The total number of drums sent by the PRP prior to August 1, 1975, divided by the total number of documented drums received by Chemdene Corporation prior to August 1 1975 multiplied by 100

**FDA Revised %** = The total number of drums sent by the PRP prior to August 1, 1975 divided by the FDA total number of all non-orphan<sup>2</sup> drums received by Chemdene Corporation prior to August 1 1975, multiplied by 100

**FDA Cost** = The FDA Revised % divided by 100 and multiplied by \$9,263,078 the total past cost<sup>3</sup> and estimated future cost associated with the FDA

**FDA Premium** = The FDA Revised % divided by 100 and multiplied by the future estimated costs for the FDA (\$9,155,725) multiplied by the premium (50%).

**MPA Drums** = The total number of drums received at the Site regardless of the date, for which the PRP is responsible.

**MPA %** = The total number of drums sent by the PRP, regardless of date divided by the total number of documented drums received by Chemdene Corporation, multiplied by 100

**MPA Revised %** = The total number of drums sent by the PRP, regardless of date, divided by the total number of non-orphan drums<sup>4</sup> received by Chemdene Corporation, regardless of date multiplied by 100.

**MPA Cost** = MPA Revised % divided by 100 and multiplied by \$9,680,799, the total past cost<sup>5</sup> and estimated future cost associated with the MPA.

**MPA Premium** = The MPA Revised % divided by 100 and multiplied by the future estimated costs for the MPA (\$7,573,426) multiplied by the premium (50%)

**Total Payment** = FDA Cost + FDA Premium + MPA Cost + MPA Premium.

<sup>1</sup> The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. The full number is used in the calculation of the Total Payment.

<sup>2</sup> Non-orphan drums are drums for which there is either a viable generator or a viable broker/transporter.

<sup>3</sup> The total past cost for the Site as of June 17 1997, is \$2,214,705.00. Half of this cost was allocated to the FDA with the other half being allocated to the MPA.

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
A & J Screw Machine Products						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
A & L Handles						43.00	0.16%	0.16%	\$13,979	\$6,098	\$20,077
A I W Frank						9.92	0.04%	0.00%	\$0	\$0	B
A. Dula Pyle						1.00	0.00%	0.00%			D
A. Johnson & Co., Inc.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
A. S. Koch Corp	137.00	6.00%	6.13%			250.00	0.91%	0.94%			A
Accumetrics						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Accuracy Scientific	3.00	0.13%	0.13%	\$12,430	\$5,472	34.18	0.12%	0.13%	\$11,112	\$4,847	\$33,861
Ace Service Corp						1.00	0.00%	0.00%			D
Acro Labels						86.00	0.31%	0.32%	\$27,956	\$12,198	\$40,154
Action Manufacturing Company	49.18	2.15%	2.20%			220.31	0.80%	0.83%			A
ADEC						6.00	0.02%	0.00%	\$0	\$0	B
Adelphia Graphics Systems						40.05	0.15%	0.15%	\$13,020	\$5,680	\$18,700
Aero Pisting						15.00	0.05%	0.00%	\$0	\$0	B
Agilar Div of Air Buenaod Inc						9.00	0.03%	0.00%	\$0	\$0	B
Airline Hydraulic Corporation						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Airworks						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Albright Paper & Box Corp						1.11	0.00%	0.00%			D
ALCOA	40.00	1.75%	1.79%			275.00	1.00%	1.03%			A
Alfa-Laval Separation, Inc						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Alister Mfg.						36.00	0.13%	0.13%	\$11,704	\$5,105	\$16,809
Amchem						70.00	0.25%	0.26%	\$22,757	\$9,927	\$32,684
American Electronics Laboratories						9.00	0.03%	0.03%	\$2,928	\$1,276	\$4,202
Ames Supply						10.00	0.04%	0.00%	\$0	\$0	B
Ametek, Inc.	9.00	0.39%	0.40%	\$37,289	\$16,416	42.18	0.15%	0.16%	\$13,713	\$5,982	\$73,399
AMF Head Division						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Amp Corp	34.00	1.49%	1.52%	\$140,870	\$62,015	133.00	0.48%	0.50%	\$43,236	\$18,861	\$264,984

\* Superseding 4/27/98 VRS

A De maximis party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan.

C To be identified for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D De minimis party

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**Malvern TCE Derfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Page 2

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Amunuel Mfg. Co						23.00	0.00%	0.00%	\$7,477	\$3,262	\$10,739
Anchor Darling Co						28.00	0.10%	0.10%	\$9,103	\$3,971	\$13,074
Angelo						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Antenna Corp						1.00	0.00%	0.00%			D
Ark Products	5.00	0.22%	0.22%	\$20,716	\$9,120	52.00	0.19%	0.19%	\$16,905	\$7,374	\$54,115
Armstrong Cork Co.						522.70	1.89%	1.90%			A
Artco Corp						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Asplundh Manufac. Co.						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Aston-Hill Co						74.00	0.27%	0.00%	\$0	\$0	B
Athens Controls						42.00	0.15%	0.16%	\$13,654	\$5,958	\$19,610
Auto-Pack						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Aydn						251.62	0.91%	0.94%			A
B P Oil						32.00	0.12%	0.12%	\$10,403	\$4,536	\$14,941
Beckett Corporation						250.55	0.91%	0.94%			A
Beemer Engineering	4.00	0.18%	0.18%	\$16,573	\$7,296	22.00	0.08%	0.08%	\$7,152	\$3,120	\$34,141
Bendru Company						21.00	0.08%	0.08%	\$6,827	\$2,978	\$9,805
Berg Laboratories						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Biddle Instrument Company						42.00	0.15%	0.16%	\$13,654	\$5,958	\$19,610
Bigram Gear Company						7.00	0.03%	0.03%	\$2,276	\$993	\$3,269
Bishop Tube Co	60.00	2.63%	2.66%	\$246,594	\$109,436	130.00	0.47%	0.49%	\$42,263	\$18,436	\$418,731
Bo Peep Cleaners						12.63	0.05%	0.05%	\$4,106	\$1,791	\$5,897
Boeing Property						2.00	0.01%	0.01%	\$650	\$264	\$934
Boehel Industries						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Boyerlown Packing Co						5.27	0.02%	0.02%	\$1,713	\$747	\$2,461
Brandt Corporation						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Brittany's Ltd.						2.00	0.01%	0.00%	\$0	\$0	B
Brooks Instrument						3.00	0.01%	0.01%	\$975	\$425	\$1,401

\* Superseding 4/27/86 VRS

A De minimis party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D De minimis party

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Brunbaugh Industries						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Budd Co						0.36	0.00%	0.00%			0
Bunnell Plastics, Inc.						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
Burroughs Corp	147.00	6.44%	6.56%			519.54	1.86%	1.95%			A
C S S International Corp	6.00	0.35%	0.36%	\$33,146	\$14,592	39.86	0.14%	0.15%	\$12,956	\$5,653	\$68,349
C W Industries						16.04	0.06%	0.06%	\$5,215	\$2,275	\$7,489
C K. Systematics, Inc.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Cabot Grouping						481.88	1.46%	1.66%			A
Cabot Beryco						143.00	0.52%	0.54%			A
Cabot Wrought Products						27.00	0.10%	0.10%			A
Cabot Company						13.00	0.05%	0.05%			A
Kawecid Beryco						218.00	0.79%	0.82%			A
Candei Metals						21.00	0.08%	0.08%	\$6,827	\$2,976	\$9,805
Canol Inc						20.00	0.07%	0.08%	\$6,531	\$2,849	\$9,380
Carvel Hail Inc						37.00	0.13%	0.14%	\$12,029	\$5,247	\$17,276
Chem Cell Corporation						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Chem Par						39.00	0.14%	0.16%	\$12,679	\$5,531	\$18,210
Chem-Solv						2.00	0.01%	0.01%	\$650	\$284	\$934
Chester County Intermediate Unit						0.07	0.00%	0.00%			D
Chovert Associates						63.15	0.31%	0.32%	\$27,862	\$12,075	\$39,937
Chrono-Log Corporation						6.28	0.02%	0.02%	\$2,042	\$884	\$2,932
Cincinnati Time						1.00	0.00%	0.00%			D
Classia Coachworks						14.00	0.05%	0.05%	\$4,951	\$1,985	\$6,937
Clifton Precision	34.00	1.49%	1.52%	\$140,870	\$62,015	82.00	0.30%	0.31%	\$26,856	\$11,629	\$241,172
Coatings For Industry Inc.						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Cobra Wire & Cable Co.						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937

\* Superseding 4/27/96 VRS

A De minimis party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan.

C Payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D De minimis party

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**Malvern TCE Refund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Concurrent Computer Corp						15.00	0.05%	0.06%	\$4,876	\$2,127	\$7,004
Connecticut Mixed						12.00	0.04%	0.00%	\$0	\$0	B
Container Research Corporation						83.00	0.30%	0.31%	\$26,983	\$11,771	\$38,754
Contamination Control, Inc						20.00	0.07%	0.07%	\$6,502	\$2,836	\$9,338
Continental Vanguard, Inc						66.45	0.24%	0.25%	-		C
Control Switch	3.00	0.13%	0.00%	\$0	\$0	32.48	0.12%	0.00%	\$0	\$0	B
Controls Service & Engineering						5.00	0.02%	0.02%	\$1,626	\$709	\$2,335
Cook Specialty Company						42.00	0.15%	0.16%	\$13,654	\$5,956	\$19,610
Crown Marketing Equipment Co						12.00	0.04%	0.04%	\$3,801	\$1,702	\$5,503
Cyprus Foote Mineral Co						495.00	1.78%	1.85%			A
Danco Tool & Mold Co						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Data Media Inc						21.00	0.06%	0.06%	\$6,827	\$2,978	\$9,805
David K. Robson, Inc						18.00	0.07%	0.07%	\$5,652	\$2,553	\$8,404
Decision Data						36.00	0.13%	0.13%	\$11,704	\$5,105	\$16,809
Defense Reutilization & Marketing Grouping						349.58	1.27%	1.31%			A
Medison, IN						13.00	0.05%	0.05%			A
DRMS/PNSY						200.72	0.73%	0.75%			A
DRMO PHILADELPHIA						54.00	0.20%	0.20%			A
Picatinny Arsenal						8.26	0.03%	0.03%			A
DRMO Knox						74.00	0.27%	0.26%			A
Delaware Container Co. Inc						9.00	0.03%	0.00%	\$0	\$0	B
Delbar Products						326.80	1.18%	1.23%			A
Delco Wire & Cable Inc / Delco Elec						47.00	0.17%	0.00%	\$0	\$0	B
Delmeco Mfg. Inc						2.00	0.01%	0.01%	\$650	\$284	\$934
Delltron Incorporated						16.55	0.07%	0.07%	\$6,031	\$2,631	\$8,661
Dentronk, Inc.						8.04	0.03%	0.03%	\$2,614	\$1,140	\$3,754

\* Superseding 4/27/96 VRS

A De maximus party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D De micromis party

**Malvern TCE Superfund Site  
Generator Volumetric Ranking Summary\***  
(By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Delta Flag Co						10.22	0.04%	0.04%	\$3,322	\$1,449	\$4,772
DeVibla, Inc						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Devon Apparel						1.00	0.00%	0.00%			D
Display Corporation of America						30.00	0.11%	0.11%	\$9,753	\$4,254	\$14,007
Diversified Electronic Corp						15.53	0.08%	0.08%	\$5,049	\$2,202	\$7,251
Dixon Industries Corp						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Doshier Jarvis						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Dorado Fabrics						119.00	0.43%	0.00%	\$0	\$0	B
Dressbrook Engineering						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Durawood						1.00	0.00%	0.00%			D
Dynamic Services						2.00	0.01%	0.00%	\$0	\$0	B
E M R Photoelectric						3.00	0.01%	0.01%	\$975	\$425	\$1,401
E Hopkins Co						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
E I T Inc Enterra Instrumentation Tech						4.51	0.02%	0.02%	\$1,486	\$640	\$2,106
E/M Corporation						13.00	0.05%	0.05%	\$4,226	\$1,844	\$6,070
East West Label Co Inc						49.50	0.18%	0.19%	\$16,082	\$7,020	\$23,112
Eaton	30.00	1.56%	1.61%	\$149,157	\$65,663	38.00	0.14%	0.14%	\$12,364	\$5,389	\$232,562
Elco Corporation	61.00	2.67%	2.73%	\$252,738	\$111,262	61.00	0.22%	0.23%	\$19,631	\$8,651	\$302,461
Electro Platers of York Inc						199.38	0.72%	0.75%	\$64,811	\$28,272	\$93,083
Electro Tech Systems Inc						1.00	0.00%	0.00%			D
Electroloy						33.00	0.12%	0.12%	\$10,728	\$4,680	\$15,408
Electronic Display Systems/Hercules						224.00	0.61%	0.64%			A
Ellaco						8.36	0.03%	0.03%	\$2,716	\$1,166	\$3,903
Emeco	3.00	0.13%	0.13%	\$12,430	\$5,472	3.00	0.01%	0.01%	\$975	\$425	\$19,302
Empire Abrasive & Equipment Corp						103.80	0.36%	0.39%	\$33,746	\$14,720	\$48,465
Ervina Crafts						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Est -Corporal						4.00	0.01%	0.00%	\$0	\$0	B

\* Superseding 4/27/98 VRS

A De minimis party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan.

C To [redacted] ment for broker/transporter is detailed on the separate Broker/Transporter Volum [redacted] ding Summary

D De minimis party

AR000233

ORIGINAL

**Malvern TCE Perfund Site  
Generator Volumetric Ranking Summary\***  
(By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
F B F Industries Inc						130 00	0.47%	0.49%	\$42,283	\$18,438	\$60,699
Fabric Development						13 00	0.05%	0.05%	\$4,228	\$1,844	\$6,070
Fairchild Space Systems						1 00	0.00%	0.00%			D
Fairfax Cleaners						8 00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Far East Foods						4 00	0.01%	0.01%	\$1,300	\$567	\$1,868
Fendt Finding Co. Inc						7 00	0.03%	0.00%	\$0	\$0	B
Fergusson						5.98	0.02%	0.02%	\$1,938	\$845	\$2,783
Fischer & Porter Co/Andrews Glass	93 00	4.07%	4.16%			794.50	2.85%	2.95%			A
Fluid Power Inc						8 00	0.02%	0.02%	\$1,951	\$851	\$2,801
Formation Inc						12 00	0.04%	0.04%	\$3,901	\$1,702	\$5,603
Formosa Plastics						39 00	0.14%	0.15%	\$12,679	\$5,531	\$18,210
Franklin Mint						8 00	0.02%	0.02%	\$1,951	\$851	\$2,801
Frazer Volpe Corporation						23.82	0.09%	0.09%	\$7,744	\$3,378	\$11,122
Frontier Chemical Waste Process						3 00	0.01%	0.01%	\$975	\$425	\$1,401
G. K. Garrett Corp						27.45	0.10%	0.10%	\$8,924	\$3,893	\$12,817
Gala Industries						3.55	0.01%	0.01%	\$1,154	\$503	\$1,658
Gas Springs						23 00	0.08%	0.09%	\$7,477	\$3,262	\$10,739
Gateway Terminal						15 00	0.05%	0.05%	\$4,878	\$2,127	\$7,004
General Electric						191 00	0.69%	0.72%	\$62,094	\$27,088	\$89,180
General Motors Corporation	5 00	0.22%	0.22%			517 00	1.87%	1.94%			A
Giles & Ransome						112.00	0.41%	0.42%	\$36,411	\$15,683	\$52,294
Giltech Inc						7 00	0.03%	0.00%	\$0	\$0	B
Glah Bros., Inc						3 00	0.01%	0.01%	\$975	\$425	\$1,401
Globe Solvents						66.38	0.24%	0.00%	\$0	\$0	B
Gould Inc.						69 00	0.25%	0.25%	\$22,107	\$9,643	\$31,750
Graphic Packaging Corp						59.57	0.22%	0.22%	\$19,308	\$8,448	\$27,814
Green Tweed Co.						5 00	0.02%	0.02%	\$1,625	\$709	\$2,335

\* Superseding 4/27/98 VRS

A De minimis party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D De minimis party

**Malvern TCE Superfund Site  
Generator Volumetric Ranking Summary\***  
(By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Gulf & Western						2.00	0.01%	0.01%	\$650	\$284	\$934
H & L Cleaners						3.00	0.01%	0.00%	\$0	\$0	B
H - V Industries, Inc						151.50	0.55%	0.57%	\$49,252	\$21,485	\$70,737
H I Services Inc.						1.00	0.00%	0.00%			D
Hahn Truck Sales						9.00	0.03%	0.00%	\$0	\$0	B
Hale Pumps, Inc.						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Hamilton Precision Metals						472.08	1.71%	1.77%			A
Hamilton Technology Inc.						1234.00	4.47%	4.62%			A
Hamilton Watch Co	197.00	8.63%	8.81%			904.00	3.27%	3.39%			A
Handy & Harman Tube Co Inc						229.18	0.83%	0.86%			A
Heat Co						31.00	0.11%	0.12%	\$10,078	\$4,368	\$14,474
Herman Goldner Co Inc						7.00	0.03%	0.03%	\$2,305	\$1,005	\$3,310
High Energy Company						84.84	0.31%	0.32%	\$27,516	\$12,003	\$39,519
Hollingsworth						7.00	0.03%	0.03%	\$2,278	\$993	\$3,268
Honeywell Instruments						5.00	0.02%	0.02%	\$1,825	\$709	\$2,335
Hough/Loew Associates						1.00	0.00%	0.00%			D
Hulltronics						2.00	0.01%	0.01%	\$650	\$284	\$934
Hurst Perf						14.00	0.05%	0.05%	\$4,651	\$1,965	\$6,537
Imperial Specialty						13.00	0.05%	0.05%	\$4,228	\$1,844	\$6,070
Industrial Systems Design						2.84	0.01%	0.00%	\$0	\$0	B
Iron Bound Heat Treating Co						7.00	0.03%	0.03%	\$2,278	\$993	\$3,268
J W Rex Co.	21.00	0.92%	0.94%	\$87,008	\$38,303	86.00	0.31%	0.32%	\$27,868	\$12,108	\$165,468
J & J Spill						43.00	0.16%	0.16%			C
James Spring & Wire Co	2.00	0.09%	0.09%	\$6,288	\$3,648	113.00	0.41%	0.42%	\$38,738	\$16,025	\$64,605
Jensen, Homer						0.36	0.00%	0.00%			D
Jetshapes Inc						27.00	0.10%	0.10%	\$8,778	\$3,829	\$12,607
John Evan's & Sons, Inc						203.29	0.74%	0.76%	\$68,089	\$28,829	\$94,918

\* Superseding 4/27/98 VRS

A De minimis party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volume Listing Summary

D De minimis party

AR000235

ORIGINAL

**Malvern TCE "Perfund Site  
Generator Volumetric Ranking Summary"  
(By Alphabetical Listing)**

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Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Johnson Company						2.00	0.01%	0.01%	\$930	\$284	\$934
Johnson-Matthey						29.55	0.11%	0.11%	\$9,607	\$4,191	\$13,797
K - D Tool Manufacturing						95.00	0.34%	0.36%	\$30,864	\$13,472	\$44,357
K S M Fastening Systems Division						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
K S O Industries						12.00	0.04%	0.00%	\$0	\$0	B
Kawneer Corp						28.00	0.09%	0.10%	\$8,453	\$3,667	\$12,140
Keystone Transformer						4.00	0.01%	0.01%	\$1,300	\$587	\$1,888
Kim Manufacturing						283.00	1.03%	1.06%			A
Kosampet						13.00	0.05%	0.05%	\$4,228	\$1,844	\$6,070
Krautbramer Branson Inc						7.00	0.03%	0.03%	\$2,276	\$993	\$3,268
Kulicke & Sofia						18.54	0.07%	0.07%	\$6,027	\$2,629	\$8,657
L & S Tool and Machine Co						3.00	0.01%	0.01%	\$975	\$425	\$1,401
LaFrance Corp	12.00	0.53%	0.54%			416.00	1.50%	1.55%			A
Laminators Inc						29.00	0.11%	0.11%	\$9,428	\$4,113	\$13,540
Lancaster Machinery Co						43.00	0.16%	0.16%	\$13,979	\$6,098	\$20,077
Lavelle Aircraft Co						189.55	0.68%	0.71%	\$61,622	\$28,881	\$90,503
Leeds & Northrop						145.72	0.53%	0.55%	\$47,373	\$20,885	\$68,038
Lightman Drum Co						0.27	0.00%	0.00%			C
Lincoln						3.00	0.01%	0.01%	\$975	\$425	\$1,401
London Harness & Cable Co						28.00	0.09%	0.10%	\$8,453	\$3,667	\$12,140
Lovetkin Corporation						6.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Lowry's						2.95	0.01%	0.00%	\$0	\$0	B
M Q S Inspection Inc /Magnaflex						48.00	0.17%	0.17%	\$14,954	\$6,529	\$21,478
Mack Electric						0.27	0.00%	0.00%			D
Mack Wayne Plastics						12.00	0.04%	0.00%	\$0	\$0	B
Malco						94.04	0.34%	0.35%	\$30,572	\$13,336	\$43,908
Manorgraphics						38.84	0.13%	0.14%	\$11,977	\$5,224	\$17,201

\* Superseding 4/27/96 VRS

A De minimis party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D De minimis party

**Malvern TCE Superfund Site  
Generator Volumetric Ranking Summary\***  
(By Alphabetical Listing)

Generator Name	FDA Drams	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drams	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Mars Electronics Inc						110.00	0.40%	0.42%	\$36,083	\$15,740	\$51,822
Mars Money Systems						1.00	0.00%	0.00%			D
Materials Electronic Products						81.00	0.29%	0.30%	\$28,333	\$11,487	\$37,820
Matheson Instrument						20.10	0.07%	0.08%	\$6,534	\$2,850	\$9,385
Matthew International						3.00	0.01%	0.01%	\$675	\$425	\$1,401
McClarin Plastics						195.04	0.71%	0.73%	\$63,407	\$27,859	\$91,066
McGee Industries Inc						97.00	0.35%	0.36%	\$31,534	\$13,756	\$45,290
McHugh Railroad Maint Equip Co						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Meade Packaging						8.00	0.03%	0.03%	\$2,801	\$1,135	\$3,735
Mel Fin	7.00	0.31%	0.31%	\$29,003	\$12,768	7.00	0.03%	0.03%	\$2,276	\$883	\$45,039
Mida Development						57.50	0.21%	0.22%	\$18,883	\$8,154	\$26,847
Mida Manufacturing	8.00	0.35%	0.00%	\$0	\$0	16.00	0.06%	0.00%	\$0	\$0	B
Mitchell Specialty						20.00	0.07%	0.00%	\$0	\$0	B
Model Finishing						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Monitor Systems	4.00	0.18%	0.18%	\$16,573	\$7,298	4.00	0.01%	0.01%	\$1,300	\$567	\$25,738
Moore Products	73.00	3.20%	3.27%	\$302,456	\$133,150	73.00	0.28%	0.27%	\$23,732	\$10,352	\$469,891
Morning Call						355.00	1.29%	1.33%			A
N G K Metals						145.00	0.53%	0.54%	\$47,139	\$20,563	\$67,702
N'W Controls	4.00	0.18%	0.18%			374.59	1.38%	1.40%			A
Napp Chemical						67.00	0.24%	0.25%	\$21,782	\$9,502	\$31,283
Narco Avionics						19.00	0.07%	0.07%	\$6,177	\$2,694	\$8,871
National Computer Systems						1.00	0.00%	0.00%			D
National Metal Crafters						16.00	0.08%	0.08%	\$5,202	\$2,289	\$7,471
National Products						1.00	0.00%	0.00%			D
National Solvents Inc						158.00	0.57%	0.00%	\$0	\$0	B
Netzsch Inc						110.00	0.40%	0.41%	\$35,761	\$15,599	\$51,300
Neutronics						10.00	0.04%	0.04%	\$3,251	\$1,418	\$4,669

\* Superceding 4/27/98 VRS

A De maximus party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan.

C Total amount for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D De maximus party

AR000237

ORIGINAL



**Malvern TCE Derfund Site  
Generator Volumetric Ranking Summary\***  
(By Alphabetical Listing)

Page 10

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
NI-Chro						300	0.01%	0.01%	\$975	\$425	\$1,401
Norco Finishing						1100	0.04%	0.04%	\$3,576	\$1,500	\$5,136
North Industrial Chemicals						6000	0.22%	0.22%			C
North Penn Polishing & Plating						52.55	0.19%	0.20%	\$17,064	\$7,452	\$24,536
Olympic Tool & Machine Co.						1600	0.06%	0.06%	\$5,292	\$2,269	\$7,471
Oxford Metal Products						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
P H L Inc.						200	0.01%	0.01%	\$650	\$264	\$934
P P & L Northern Div S C						257.27	0.93%	0.96%			A
Parls Business Forms						200	0.01%	0.01%	\$650	\$264	\$934
Perflex Inc.	42.00	1.84%	1.86%	\$174,016	\$76,607	123.31	0.45%	0.47%	\$40,736	\$17,771	\$309,131
Penguin Industries						119.00	0.43%	0.45%	\$36,667	\$16,676	\$55,562
Penn Airborn Product						15.31	0.06%	0.06%	\$4,977	\$2,171	\$7,146
Penn Dye & Finishing						15.00	0.05%	0.06%	\$4,676	\$2,127	\$7,004
Pennsbury Manufacturing						32.00	0.12%	0.00%	\$0	\$0	B
Pennwell Corp						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Penoke V D A						8.00	0.03%	0.03%	\$2,601	\$1,135	\$3,735
Pepco Manufacturing Co						200	0.01%	0.01%	\$650	\$264	\$934
Peripheral Dynamics						300	0.01%	0.01%	\$975	\$425	\$1,401
Parkin-Elmer						100	0.00%	0.00%			D
Permuf/Sybron Corp						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Peter Paul Cadbury Co						200	0.01%	0.01%	\$650	\$264	\$934
Petrocon	35.00	1.53%	1.57%	\$145,013	\$63,639	35.00	0.13%	0.13%	\$11,376	\$4,963	\$225,194
Petter Engraving Inc.						204	0.01%	0.01%	\$663	\$269	\$952
Phila Electric Co Oregon Maint Shops						34.45	0.12%	0.13%	\$11,200	\$4,665	\$16,065
Philadelphia Rust Proof Co Inc						21.00	0.06%	0.06%	\$6,627	\$2,976	\$9,603
Philco Ford	6.00	0.26%	0.27%	\$24,659	\$10,944	6.00	0.02%	0.02%	\$1,851	\$651	\$36,605
Phlips & Jacob	4.00	0.16%	0.16%			400	0.01%	0.01%			C

\* Superseding 4/27/86 VRS

A De minimis party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D De minimis party

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Photofabrication Chem & Equip						7.19	0.03%	0.03%	\$2,337	\$1,020	\$3,357
Photolastic Inc.	11.00	0.40%	0.40%	\$45,576	\$20,064	11.00	0.04%	0.04%	\$3,576	\$1,680	\$70,775
Pitman Corp						47.00	0.17%	0.16%	\$15,260	\$6,665	\$21,945
Plate Crafters Inc						16.00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Plymouth Tube	9.00	0.30%	0.40%			568.37	2.05%	2.12%			A
Pocono Foundry Inc						1.00	0.00%	0.00%			D
Polysciences						164.00	0.67%	0.69%	\$59,918	\$26,094	\$85,912
Ponderosa Disposal Co						10.00	0.04%	0.00%			C, B
Porter Instruments						228.27	0.83%	0.85%			A
Precision Arts Mfg.						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Prince Instruments Inc						79.00	0.29%	0.30%	\$25,683	\$11,203	\$36,886
Prodefin Inc						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Pyco Inc.						6.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Quaker City Chemicals	7.00	0.31%	0.31%			268.09	0.97%	1.00%			C, A
R & E Martin, Inc						116.29	0.42%	0.44%			C
R C A	32.00	1.40%	1.43%	\$132,584	\$56,367	177.00	0.64%	0.66%	\$57,542	\$25,101	\$273,584
R C Kietzing						2.50	0.01%	0.01%	\$613	\$355	\$1,167
R D L Inc						23.00	0.08%	0.08%	\$7,477	\$3,282	\$10,739
R. R. Donnelley & Sons, Inc.						27.00	0.10%	0.10%	\$8,778	\$3,829	\$12,607
Rally Plating						430.00	1.56%	1.61%			A
Repco	9.00	0.39%	0.00%	\$0	\$0	14.00	0.05%	0.00%	\$0	\$0	B
Resource Technology Services, Inc.						473.72	1.72%	1.77%			C, A
Reynolds Cleaners						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Reynolds Metals						9.00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Richard Hural						4.08	0.01%	0.00%	\$0	\$0	B
S G L						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
S K F Industries Inc						133.36	0.48%	0.50%	\$43,355	\$18,912	\$62,267

\* Superceding 4/27/98 VRS

A De minimis party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D De minimis party

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**Malvern TCE Perfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

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Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
S P D Technologies						87 00	0.32%	0.33%	\$28,284	\$12,338	\$40,621
S P S Technologies						167 00	0.60%	0.63%	\$54,291	\$23,683	\$77,974
Sandvik, Inc.						70 90	0.26%	0.27%	\$23,049	\$10,055	\$33,104
Sarivan Labs						4 00	0.01%	0.01%	\$1,300	\$587	\$1,888
Schmidt Brewery Co						1 00	0.00%	0.00%	.		B
Schramm Inc						1.00	0.00%	0.00%			B
Scotco Design Group Inc						69 00	0.25%	0.26%	\$22,432	\$9,765	\$32,217
Scott Paper Corp						4 00	0.01%	0.01%	\$1,300	\$587	\$1,888
Sermetal						6 00	0.02%	0.02%	\$1,851	\$851	\$2,801
Shared Medical Systems						3 27	0.01%	0.01%	\$1,083	\$484	\$1,527
Sharples Inc						16 00	0.06%	0.06%	\$5,202	\$2,269	\$7,471
Shur-Kut Supply Corp						7 00	0.03%	0.03%	\$2,276	\$993	\$3,268
Sidens Co						18 00	0.07%	0.07%	\$5,852	\$2,553	\$8,404
Sivine						7 00	0.03%	0.03%	\$2,276	\$993	\$3,268
Simco Company Inc						4 52	0.02%	0.02%	\$1,468	\$641	\$2,110
Simon Wrecking Company Inc	715 51	31.33%	32.00%			983 51	3.66%	3.66%			A
Sironetti Brothers						53.28	0.19%	0.00%	\$0	\$0	B
Simpson Sign Co						16 52	0.06%	0.00%	\$0	\$0	B
Singer Co.						3 00	0.01%	0.01%	\$975	\$425	\$1,401
Solar Atmospheres						4 00	0.01%	0.01%	\$1,300	\$587	\$1,888
Solitario						57.00	0.21%	0.00%	\$0	\$0	B
Solid State Scientific						32.00	0.12%	0.12%	\$10,403	\$4,538	\$14,941
Sonic Instruments						15 00	0.06%	0.00%	\$4,878	\$2,127	\$7,004
Specialty Coatings Inc						33 00	0.12%	0.12%	\$10,728	\$4,680	\$15,408
Specialty Glass Products						1 00	0.00%	0.00%			B
Sperry Univac						2 00	0.01%	0.01%	\$650	\$284	\$934
Spra-Fin Inc						72.41	0.26%	0.27%	\$23,540	\$10,269	\$33,809

\* Superseding 4/27/88 VRS

A De minimis party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D De minimis party

A B C D E F G H I J K L M N O P Q R S T U V W X Y Z

**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Sprague-Griffiths Div						9.00	0.03%	0.03%	\$2,828	\$1,276	\$4,202
Stein Seal Co						136.00	0.50%	0.52%	\$44,863	\$19,570	\$64,434
Sterling Fishmen Co.						3.11	0.01%	0.01%	\$1,011	\$441	\$1,452
Storm Weather Products						28.00	0.09%	0.10%	\$8,453	\$3,687	\$12,140
Sunroc Corp	52.00	2.26%	2.33%			358.00	1.30%	1.34%			A
Sunkamp Industries	9.00	0.36%	0.00%	\$0	\$0	9.00	0.03%	0.00%	\$0	\$0	B
Superior Metal Products						58.00	0.21%	0.22%	\$18,856	\$8,225	\$27,081
Superior Tube	21.00	0.92%	0.94%	\$87,008	\$36,303	71.00	0.26%	0.27%	\$23,082	\$10,089	\$158,462
Sweda/Hugh Group						4.00	0.01%	0.01%	\$1,300	\$567	\$1,868
Sweda/Lifton						25.00	0.09%	0.09%	\$8,127	\$3,545	\$11,673
Syntex/Star Grouping						726.88	2.63%	2.72%			A
Syntex Dental Products						115.00	0.42%	0.43%			A
Star Dental Corporation						610.00	2.21%	2.26%			A
Synthene Taylor Corp						71.00	0.26%	0.27%	\$23,082	\$10,089	\$33,181
T R W Inc.						0.45	0.00%	0.00%			D
Techalloy Inc.						11.87	0.04%	0.04%	\$3,784	\$1,855	\$5,449
Technical Products						14.00	0.05%	0.05%	\$4,551	\$1,965	\$6,537
Technitrol	10.00	0.44%	0.45%	\$41,432	\$18,240	10.00	0.04%	0.04%	\$3,251	\$1,418	\$84,341
Tele Dynamics						8.00	0.02%	0.02%	\$1,951	\$851	\$2,801
Telegenix Inc.						30.00	0.11%	0.11%	\$9,753	\$4,254	\$14,007
Thermoseal Glass Corporation						2.00	0.01%	0.01%	\$650	\$284	\$934
Thomson Engineering Co	0.02	0.00%	0.00%			0.02	0.00%	0.00%			D
Transducer Systems Inc						17.00	0.06%	0.06%	\$5,527	\$2,411	\$7,937
Trend Instruments						31.18	0.11%	0.12%	\$10,137	\$4,422	\$14,558
Troemner, Henry						3.00	0.01%	0.01%	\$975	\$425	\$1,401
Tube Methods						1.00	0.00%	0.00%			D

\* Superceding 4/27/98 VRS

A De minimis party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volume 1 Ranking Summary

D De minimis party

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**Malvern TCE    Yrfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

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Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Tudor Tech Inc						1 00	0.00%	0.00%			D
U S A Ardec						11 00	0.04%	0.04%	\$3,576	\$1,560	\$5,136
U S Electronic Services Corp	19 00	0.83%	0.00%	\$0	\$0	19 00	0.07%	0.00%	\$0	\$0	B
United Chem-Con Corp						21.00	0.06%	0.00%	\$0	\$0	B
United Contamination Controls Inc						4.00	0.01%	0.01%	\$1,300	\$567	\$1,666
USG Grouping						898.49	2.12%	2.29%			A
U S G Interiors						162.00	0.66%	0.66%			A
Floor Systems Inc						71 40	0.26%	0.27%			A
Donn Corporation						292.00	1.06%	1.09%			A
Davey Products						41 00	0.15%	0.15%			A
Valley Forge Laboratories Inc						7 00	0.03%	0.03%	\$2,276	\$993	\$3,268
Valley Forge Tape & Label Co						122.36	0.44%	0.46%	\$39,779	\$17,352	\$57,131
Victualic Company of America						9 00	0.03%	0.03%	\$2,926	\$1,276	\$4,202
Vishay Resistive Systems						241 00	0.87%	0.90%			A
Viz Manufacturing	104 00	4.55%	4.65%			819.64	2.97%	3.07%			A
Waste Conversion						104.00	0.36%	0.39%			C
Wave Energy Systems						3 00	0.01%	0.00%	\$0	\$0	B
Welding Co						1 00	0.00%	0.00%			D
Water Inc.						61 00	0.22%	0.23%	\$19,831	\$8,651	\$26,482
Westcode Inc.						26.22	0.10%	0.11%	\$9,174	\$4,002	\$13,176
Western Electric	139 00	6.06%	6.22%			2063 00	7.54%	7.60%			A
Westinghouse						23 00	0.06%	0.09%	\$7,477	\$3,262	\$10,739
Wilkinson Industries						3 00	0.01%	0.00%	\$0	\$0	B
Wiltronics						0.30	0.00%	0.00%			D
Woodstream Corp						5.00	0.02%	0.02%	\$1,625	\$709	\$2,335
Xynatech Inc.						39 00	0.14%	0.15%	\$12,679	\$5,531	\$16,210

\* Superseding 4/27/96 VRS

A De minimis party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan.

C Total payment for broker/transporter is detailed on the separate Broker/Transporter Volumetric Ranking Summary

D De minimis party

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**Malvern TCE Superfund Site**  
**Generator Volumetric Ranking Summary\***  
 (By Alphabetical Listing)

Generator Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Generator Total De Minimis Payment
Yucca-Exide Battery Corp						18 13	0.07%	0.07%	\$5,894	\$2,571	\$8,465
Zenith Products Corp						63 00	0.23%	0.24%	\$20,481	\$8,834	\$29,315
De Minimis Total:	873.89	25.89%	23.48%	\$2,100,627	\$484,267	864.37	26.89%	23.81%	\$2,796,132	\$1,219,267	\$7,123,333
Total:	2283.71	100.00%	100.00%			27988.87	100.00%	100.00%			

\* Superseding 4/27/98 VRS

A De minimis party and does not qualify for de minimis settlement offer

B Party has been identified as an orphan

C To [ ]ent for broker/transporter is detailed on the separate Broker/Transporter Volum [ ]ding Summary

D De minimis party

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**Malvern TCE Superfund Site  
Explanation Sheet for the Final Volumetric Ranking Summary (VRS)**

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site (the Site) Final Volumetric Ranking Summary (VRS). Please refer to the example provided below for an illustration of the process used to calculate individual total payment<sup>1</sup>.

PRP Name	FDA Drums	FDA %	FDA Revised %	FDA Cost	FDA Premium	MPA Drums	MPA %	MPA Revised %	MPA Cost	MPA Premium	Total Payment
ABC Corporation	34	1.49 %	1.52 %	\$141,249	\$62,182	82	0.29 %	0.30 %	\$26,325	\$11,483	\$241,239

**PRP Name** = The name of the specific potentially responsible party (PRP). Subsidiaries may be listed separately from parent companies, therefore, please review the VRS in its entirety to identify company subsidiaries that may have done business with Chemclene Corporation.

**FDA Drums** = The total number for drums sent to the Site before August 1, 1975.

**FDA %** = The total number of drums sent by the PRP prior to August 1, 1975, divided by the total number of documented drums received by Chemclene Corporation prior to August 1, 1975 multiplied by 100.

**FDA Revised %** = The total number of drums sent by the PRP prior to August 1, 1975 divided by the FDA total number of all non-orphan<sup>2</sup> drums received by Chemclene Corporation prior to August 1, 1975, multiplied by 100.

**FDA Cost** = The FDA Revised % divided by 100 and multiplied by \$9,263,078, the total past cost<sup>3</sup> and estimated future cost associated with the FDA.

**FDA Premium** = The FDA Revised % divided by 100 and multiplied by the future estimated costs for the FDA (\$8,155,725) multiplied by the premium (50%).

**MPA Drums** = The total number of drums received at the Site, regardless of the date for which the PRP is responsible.

**MPA %** = The total number of drums sent by the PRP regardless of date, divided by the total number of documented drums received by Chemclene Corporation, multiplied by 100.

**MPA Revised %** = The total number of drums sent by the PRP, regardless of date, divided by the total number of non-orphan drums<sup>2</sup> received by Chemclene Corporation regardless of date, multiplied by 100.

**MPA Cost** = MPA Revised % divided by 100 and multiplied by \$8,680,799, the total past cost<sup>3</sup> and estimated future cost associated with the MPA.

**MPA Premium** = The MPA Revised % divided by 100 and multiplied by the future estimated costs for the MPA (\$7,573,426) multiplied by the premium (50%).

**Total Payment** = FDA Cost + FDA Premium + MPA Cost + MPA Premium

<sup>1</sup> The FDA Cost, FDA Premium, MPA Cost and MPA Premium figures are rounded to zero decimal places for display purposes only. The full number is used in the calculation of the Total Payment.

<sup>2</sup> Non-orphan drums are drums for which there is either a viable generator or a viable broker/transporter.

<sup>3</sup> The total past cost for the Site as of June 17, 1997 is \$2,214,705.00. Half of this cost was allocated to the FDA, with the other half being allocated to the MPA.

11/30/98

# Malvern TCE Superfund Site Broker/Transporter Volumetric Ranking Summary\*

Page 1 of 1

PRP Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Broker/ Transporter Total Payment	Generator Total De Minimis Payment	Total De Minimis Payment
Continental Vanguard, Inc						89.38	0.32%	0.33%	\$29,062	\$12,877	\$41,739	\$30,571	\$72,310
Eldredge, Inc.						549.53	1.99%	2.08%					A
F T C Hazardous						89.91	0.33%	0.34%	\$29,240	\$12,755	\$41,995	\$0	\$41,995
Inland Pumping & Dredging Corp.						67.00	0.24%	0.00%					B
J & J Spill						115.54	0.42%	0.43%	\$37,576	\$16,391	\$53,967	\$20,085	\$74,052
Keystone-Block Transportation						723.27	2.62%	2.71%					A
Lightman Drum Co.						48.00	0.17%	0.18%	\$15,811	\$6,810	\$22,420	\$128	\$22,548
North Industrial Chemicals						24.00	0.09%	0.09%	\$7,805	\$3,405	\$11,210	\$28,025	\$39,235
P Q Corporation						67.00	0.24%	0.25%	\$21,790	\$9,505	\$31,295	\$0	\$31,295
Philadelphia Steel Drum Co. Inc						43.00	0.16%	0.16%	\$13,984	\$6,100	\$20,085	\$0	\$20,085
Phillips & Jacob	20.00	0.86%	0.86%	\$82,865	\$38,479	20.00	0.07%	0.07%	\$6,504	\$2,837	\$128,888	\$25,804	\$154,490
Ponderosa Disposal Co						111.00	0.40%	0.00%					B
Quaker City Chemicals	52.00	2.28%	2.33%			333.11	1.21%	1.25%					A
R & E Martin, Inc						95.00	0.20%	0.21%	\$17,887	\$7,803	\$25,690	\$54,317	\$80,007
Resource Technology Services, Inc						208.27	0.75%	0.77%					A
Waste Conversion						38.00	0.14%	0.14%	\$12,358	\$5,391	\$17,749	\$97,154	\$114,903
Waste Consulting & Brokerage						5.38	0.02%	0.02%	\$1,743	\$760	\$2,504	\$0	\$2,504
U S Environmental Services						4.00	0.01%	0.01%	\$1,301	\$567	\$1,868	\$0	\$1,868
<b>Total:</b>	<b>72.00</b>	<b>3.16%</b>	<b>3.22%</b>	<b>\$82,865</b>	<b>\$38,479</b>	<b>2589.38</b>	<b>8.38%</b>	<b>8.82%</b>	<b>\$184,841</b>	<b>\$85,861</b>	<b>\$368,208</b>	<b>\$258,882</b>	<b>\$646,291</b>

\* Superseding 4/27/98 VRS

A Party does not qualify for de minimis settlement offer

B Party has identified as an orphan

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## Appendix C-2 AOC II VRS

**Malvern TCE Superfund Site**  
**Explanation Sheet for the Second Round De Minimis Settlement Volumetric Ranking Summary**

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site (the Site) New Volumetric Ranking Summary (VRS) for the Second Round De Minimis Settlement. This New VRS for the Second Round De Minimis Settlement supplants the VRS dated 11/30/98 only in reference to the parties eligible for this Second Round De Minimis Settlement.<sup>1</sup>

**PRP Name** - The name of the specific potentially responsible party (PRP)

**FDA Drums** - The total number of drums sent to the Site by each PRP before August 1, 1975

**FDA %** - The total number of drums sent by the PRP to the Site prior to August 1, 1975 divided by the total number of documented drums received by Chemclene prior to August 1, 1975 multiplied by 100

**FDA Revised %** - The total number of drums sent by the PRP prior to August 1, 1975 divided by the FDA total number of all non-orphan<sup>2</sup> drums received by Chemclene Corporation prior to August 1, 1975 multiplied by 100

**FDA Cost** - The FDA Revised % divided by 100 and multiplied by \$10,544,199.49 the total past costs<sup>3</sup> and estimated future cost associated with the FDA

**FDA Premium** - The FDA Revised % divided by 100 and multiplied by future estimated costs for the FDA (\$8,155,725) multiplied by the premium (50% plus an additional 10% for those parties who were offered but declined to participate in the 1999 de minimis settlement).

**MPA Drums** - The total number of drums sent by each PRP regardless of the date

**MPA %** - The total number of drums sent by the PRP regardless of date divided by the total number of documented drums received by Chemclene Corporation multiplied by 100

**MPA Revised %** - The total number of drums sent by the PRP regardless of date divided by the total number of non-orphan<sup>2</sup> drums received by Chemclene Corporation multiplied by 100

**MPA Cost** - MPA Revised % divided by 100 and multiplied by \$9,961,900.49 the total past cost<sup>3</sup> and estimated future cost associated with the MPA

**MPA Premium** - The MPA Revised %, divided by 100 and multiplied by the future estimated costs for the MPA (\$7,573,426) multiplied by the premium (50% plus an additional 10% for those parties who were offered but declined to participate in the 1999 de minimis settlement)

**Total Payment** - The sum of the FDA Cost, FDA Premium, MPA Cost, and MPA Premium

<sup>1</sup> The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only. The full number is used in the calculation of the Total Payment.

<sup>2</sup> Non-orphan drums are drums for which there was either a viable generator or a viable broker/transporter as of November 30, 1998.

<sup>3</sup> The total past cost for the Site as of October 3, 2000 is \$4,776,948.97. Half of this cost was allocated to the FDA, with the other half being allocated to the MPA.

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05/29/2001

**Malvern TCE Superfund Site  
Second Round De Minimis Settlement  
Volumetric Ranking Summary  
(Alphabetical by PRP)**

Page 1 of 1

PRP Name	FDA Drums	FDA %	FDA Revised %	FDA Cost	FDA Premium	MPA Drums	MPA %	MPA Revised %	MPA Cost	MPA Premium	Total Payment
American Electronics Laboratories						9 00	0 03%	0 03%	\$3 247	\$1 530	\$4 778
Boekel Industries						13 00	0 05%	0 05%	\$4 691	\$2,210	\$6 901
Elco Corporation	61 00	2 67%	2 73%	\$287,892	\$133 514	61 00	0 22%	0 23%	\$22 010	\$10 372	\$453 589
Ervin's Crafts						5 00	0 02%	0 02%	\$1 804	\$850	\$2 654
K D Tool Manufacturing						95 00	0 34%	0 36%	\$34 278	\$16 153	\$50 432
Maida Development						57 5	0 21%	0 22%	\$20 747	\$9 777	\$30 524
McHugh Railroad Maint Equip Co						4 00	0 01%	0 01%	\$1 443	\$680	\$2 123
Photofabrication Chemical & Equipment						7 19	0 03%	0 03%	\$2 594	\$1,223	\$3 817
R & E Martin						171 29	0 62%	0 64%	\$61 805	\$29 125	\$90 931
Technitrol	10	0 44%	0 45%	\$47 163	\$18 240	10	0 04%	0 04%	\$3 608	\$1 417	\$70 428
<b>Total</b>	<b>71</b>					<b>432 98</b>					<b>\$716 177</b>

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**Malvern TCE Superfund Site  
Second De Minimis Settlement  
Volumetric Ranking Summary  
(Descending)**

PRP Name	FDA Drums	FDA %	FDA Revised %	FDA Cost	FDA Premium	MPA Drums	MPA %	MPA Revised %	MPA Cost	MPA Premium	Total Payment
Elco Corporation	61 00	2 67%	2 73%	\$287 692	\$133 514	61 00	0 22%	0 23%	\$22 010	\$10,372	\$453 589
R & E Martin						171 29	0 62%	0 64%	\$61 805	\$29 125	\$90 931
Technitrol	10 00	0 44%	0 45%	\$47 163	\$18 240	10 00	0 04%	0 04%	\$3 608	\$1 417	\$70 428
K-D Tool Manufacturing Co						95 00	0 34%	0 36%	\$34 278	\$16 153	\$50 432
Maida Development						57 5	0 21%	0 22%	\$20 747	\$9 777	\$30 524
Boekel Industries						13 00	0 05%	0 05%	\$4 691	\$2 210	\$6 901
American Electronics Laboratories						9 00	0 03%	0 03%	\$3 247	\$1 530	\$4 778
Photofabrication Chemical & Equipment						7 19	0 03%	0 03%	\$2 594	\$1 223	\$3 817
Ervin Crafts						5 00	0 02%	0 02%	\$1 804	\$850	\$2 654
McHugh Railroad Maint Equip Co						4 00	0 01%	0 01%	\$1 443	\$680	\$2 123
<b>Total</b>	<b>71</b>					<b>432 98</b>					<b>\$716 177</b>

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## Appendix D AOC III VRS

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Third Round De Minimis Settlement

Volumetric Ranking Summary

(by Descending Order)

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PRP Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Broker/Transporter Total Payment	Generator Total Payment	Total Payment
Frazer Volpe Corporation						23 82	0 09	0 09	\$9 678	\$15 098			\$24 776
Model Finishing						25 00	0 09	0 10	\$10 157	\$15 846			\$26 003
Storm Weather Products						26 00	0 09	0 10	\$10 563	\$16 480			\$27 043
G K Garrett Corporation						27 45	0 10	0 11	\$11 152	\$17 399			\$28 551
Solid State Scientific						32 00	0 12	0 12	\$13 001	\$11 268			\$24 269
Accuracy Scientific Instruments	3 00	0 13	0 14	\$15 186	\$13 466	34 18	0 12	0 13	\$13 887	\$12 036			\$54 575
Allister Manufacturing						36 00	0 13	0 14	\$14 626	\$22 818			\$37 444
Carvel Hall Inc						37 00	0 13	0 14	\$15 032	\$23 452			\$38 484
Xynatech Inc						39 00	0 14	0 15	\$15 845	\$24 720			\$40 565
Athena Controls						42 00	0 15	0 16	\$17 064	\$26 621			\$43 685
Ametek Inc	9 00	0 39	0 41	\$45 558	\$72 718	42 18	0 15	0 16	\$17 137	\$26 735			\$162 148
J & J Spill (Generator Drums)						43 00	0 16	0 17	\$17 470	\$27 255		\$44 725	\$44 725
Philadelphia Steel Drum (Brokered Drums)						43 00	0 16	0 17	\$17 470	\$27 255	\$44 725		\$44 725
Lightman Drum Co (Brokered Drums)						48 00	0 17	0 18	\$19 501	\$30 424	\$49 926		\$49 926
Ark Products	5 00	0 22	0 23	\$25 310	\$40 399	52 00	0 19	0 20	\$21 126	\$32 960			\$119 795
Princo Instruments Inc						79 00	0 29	0 30	\$32 096	\$50 073			\$82 169
High Energy Company						84 64	0 31	0 33	\$34 387	\$53 648			\$88 035
FTC Hazardous (Broker)						89 91	0 33	0 35	\$36 528	\$56 989	\$93 517		\$93 517
Malco Inc						94 04	0 34	0 36	\$38 206	\$59 606			\$97 813
J & J Spill (Brokered Drums)						115 54	0 42	0 44	\$46 941	\$73 234	\$120 175		\$120 175
Bishop Tube	60 00	2 63	2 73	\$303 718	\$484 789	130 00	0 47	0 50	\$52 816	\$82 399			\$923 722
Amp	34 00	1 49	1 54	\$172 107	\$274 714	133 00	0 48	0 51	\$54 035	\$84 301			\$585 156
Leeds & Northrop						145 72	0 53	0 56	\$59 203	\$92 363			\$151 566
McClarin Plastics						195 04	0 71	0 75	\$79,240	\$123,624			\$202,864
3rd Round De Minimis Total Number of Drums	120 00					1909 02							\$3,494,932
Site Total Number of Drums	2283 71					27608 87							

Indicates 125% Premium is applied All other parties receive 225% Premium

\*J & J Spill Total Payment = \$164 928

\* Lightman Drum Total Payment = \$50 247

## Third Round De Minimis Settlement

## Volumetric Ranking Summary

(by Descending Order)

PRP Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Broker/ Transporter Total Payment	Generator Total Payment	Total Payment
Lightman Drum Co (Generator Drums) **						0 27	0 00	0 00	\$110	\$171		\$281	\$281
Chem Solv						2 00	0 01	0 01	\$813	\$1 268			\$2 080
Gulf & Western						2 00	0 01	0 01	\$813	\$1 268			\$2 080
Hulltronics						2 00	0 01	0 01	\$813	\$1 268			\$2 080
R C Kletzing						2 50	0 01	0 01	\$1 016	\$1 585			\$2 600
Emeco	3 00	0 13	0 14	\$15 186	\$24 239	3 00	0 01	0 01	\$1 219	\$1 902			\$42 546
Glah Brothers Inc *						3 00	0 01	0 01	\$1 219	\$1 056			\$2 275
Ni Chro						3 00	0 01	0 01	\$1 219	\$1 902			\$3 120
Precision Arts Mfg						3 00	0 01	0 01	\$1 219	\$1 902			\$3 120
Airline Hydraulics Corporation						4 00	0 01	0 02	\$1 625	\$2 535			\$4 160
E Hopkins Company						4 00	0 01	0 02	\$1 625	\$2 535			\$4 160
Keystone Transformer*						4 00	0 01	0 02	\$1 625	\$1 409			\$3 034
U S Environmental Services (Brokered Drums)						4 00	0 01	0 02	\$1 625	\$1 409	\$3 034		\$3 034
Waste Consulting & Brokerage (Brokered Drums)*						5 36	0 02	0 02	\$2 178	\$1 887	\$4 065		\$4 065
Fergusson						5 96	0 02	0 02	\$2 421	\$3 778			\$6 199
Philco Ford	6 00	0 26	0 27	\$30 372	\$26 933	6 00	0 02	0 02	\$2 438	\$2 113			\$61 855
Sermetal						6 00	0 02	0 02	\$2 438	\$2 113			\$4 550
Shur Kut Supply Corp						7 00	0 03	0 03	\$2 844	\$4 437			\$7 281
Fairfax Cleaners						8 00	0 03	0 03	\$3 250	\$5 071			\$8 321
Penske VDA*						8 00	0 03	0 03	\$3 250	\$2 817			\$6 067
Prodelin Inc						9 00	0 03	0 03	\$3 656	\$5 705			\$9 361
Technitrol						10 00	0 04	0 04	\$4 063	\$3 521			\$7 584
Fabric Development						13 00	0 05	0 05	\$5 282	\$8 240			\$13 522
Kosempel Manufacturing Co *						13 00	0 05	0 05	\$5 282	\$4 578			\$9 859
Penn Airborne Products						15 31	0 06	0 06	\$6 220	\$9 704			\$15 924
National Metalcrafters						16 00	0 06	0 06	\$6 500	\$10 141			\$16 642
CK Systematics Inc						17 00	0 06	0 07	\$6 907	\$10 775			\$17 682
Oxford Metal Products						17 00	0 06	0 07	\$6 907	\$10,775			\$17 682
David K Robson Inc						18 00	0 07	0 07	\$7 313	\$11 409			\$18 722
Narco Avionics						19 00	0 07	0 07	\$7 719	\$12 043			\$19 762
Contamination Control						20 00	0 07	0 08	\$8 126	\$12 677			\$20 802
Matheson Instrument						20 10	0 07	0 08	\$8 166	\$12 740			\$20 906
Camdel Metals						21 00	0 08	0 08	\$8 532	\$13 311			\$21 842



multiplied by the applicable premium (125% or 225%)

MPA Drums = The total number of drums sent by each PRP to the Site, regardless of the date

MPA % = The total number of drums sent by the PRP to the Site, regardless of date, divided by the total number of documented drums received by Chemclene Corporaton (27,608 87 drums), multiplied by 100

MPA Revised % = The total number of drums sent by the PRP to the Site, regardless of date, divided by the total number of non orphan<sup>2</sup> drums received by Chemclene Corporation (25,986 05 drums), multiplied by 100

MPA Cost = MPA Revised % divided by 100 and multiplied by the sum of \$10,557,520 90, the total Past Cost<sup>3</sup> and Estimated Future Costs associated with th MPA

MPA Premium = The MPA Revised %, divided by 100 and multiplied by the future estimated costs for the MPA (\$7,320,441) multiplied by the applicable premium (125% or 225%)

Transporter Total Payment = The total payment (representing the sum of the FDA Cost, FDA Premium, MPA Cost, and MPA Premium) required for each *De Minimis* PRP identified in the VRS as a Transporter PRP

Generator Total Payment = The total payment (representing the sum of the FDA Cost, FDA Premium, MPA Cost, and MPA Premium) required for each *De Minimis* PRP identified in the VRS as a Generator PRP

**Malvern TCE Superfund Site**  
**Explanation Sheet for the Third Round De Minimis Settlement - Volumetric Ranking Summaries**

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site ("Site") Third Round De Minimis Settlement Volumetric Ranking Summary, dated 7/31/03 ("VRS")<sup>1</sup>

PRP Name = The name of the specific potentially responsible party ( "PRP")

FDA Drums = The total number of drums sent to the Site by each PRP before August 1, 1975

FDA % = The total number of drums sent by the PRP to the Site prior to August 1, 1975, divided by the total number of documented drums received by Chemclene prior to August 1, 1975 (2,283 71 FDA drums), multiplied by 100

FDA Revised % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan<sup>2</sup> FDA drums received by Chemclene Corporation prior to August 1, 1975 (2,200 69 FDA drums), multiplied by 100

FDA Cost = The FDA Revised % divided by 100 and multiplied by the sum of \$11,139,818 90 ( the total past costs<sup>3</sup> and estimated future cost associated with the FDA)

FDA Premium = The FDA Revised % divided by 100 and multiplied by future estimated costs for the FDA (\$7,902,739 00)

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<sup>1</sup> The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only Full numbers are used in the calculation of the DeMinimis Payment

<sup>2</sup> Non-orphan drums reflect total drums into the Site, excluding drums attributed to orphans and non settling de minimis parties The total orphan and non settling de minimis drums used for this settlement are 83 02 FDA drums and 1,622 82 MPA drums

<sup>3</sup> For purposes of this settlement, the total past costs for the Site is \$6,474,159 80 (\$5,302,459 63 in EPA Past Costs through June 26, 2002, \$359,739 17 in DOJ Past Costs through May 3, 2003, and \$811,961 00 in waterline costs incurred by the RD/RA Consent Decree PRPs) One-half of the Past Costs total, \$3,237,079 90, has been allocated to the FDA, the other half has been allocated to the MPA

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**Malvern TCE Superfund Site**  
**Explanation Sheet for the Third Round De Minimis Settlement - Volumetric Ranking Summaries**

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site ( 'Site') Third Round De Minimis Settlement Volumetric Ranking Summary, dated 7/31/03 ( 'VRS')<sup>1</sup>

PRP Name = The name of the specific potentially responsible party ( 'PRP')

FDA Drums = The total number of drums sent to the Site by each PRP before August 1, 1975

FDA % = The total number of drums sent by the PRP to the Site prior to August 1, 1975, divided by the total number of documented drums received by Chemclene prior to August 1, 1975 (2,283 71 FDA drums), multiplied by 100

FDA Revised % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan<sup>2</sup> FDA drums received by Chemclene Corporation prior to August 1, 1975 (2,200 69 FDA drums), multiplied by 100

FDA Cost = The FDA Revised % divided by 100 and multiplied by the sum of \$11,139,818 90 ( the total past costs<sup>3</sup> and estimated future cost associated with the FDA)

FDA Premium = The FDA Revised % divided by 100 and multiplied by future estimated costs for the FDA (\$7,902,739 00)

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<sup>1</sup> The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only Full numbers are used in the calculation of the DeMinimis Payment

<sup>2</sup> Non-orphan drums reflect total drums into the Site, excluding drums attributed to orphans and non-settling de minimis parties The total orphan and non-settling de minimis drums used for this settlement are 83 02 FDA drums and 1,622 82 MPA drums

<sup>3</sup> For purposes of this settlement, the total past costs for the Site is \$6,474,159 80 (\$5,302,459 63 in EPA Past Costs through June 26, 2002, \$359,739 17 in DOJ Past Costs through May 3, 2003, and \$811,961 00 in waterline costs incurred by the RD/RA Consent Decree PRPs) One-half of the Past Costs total, \$3,237,079 90, has been allocated to the FDA, the other half has been allocated to the MPA

multiplied by the applicable premium (125% or 225%)

MPA Drums = The total number of drums sent by each PRP to the Site, regardless of the date

MPA % = The total number of drums sent by the PRP to the Site, regardless of date, divided by the total number of documented drums received by Chemclene Corporaton (27,608 87 drums), multiplied by 100

MPA Revised % = The total number of drums sent by the PRP to the Site, regardless of date, divided by the total number of non-orphan<sup>2</sup> drums received by Chemclene Corporation (25,986 05 drums) multiplied by 100

MPA Cost = MPA Revised % divided by 100 and multiplied by the sum of \$10 557 520 90 the total Past Cost<sup>3</sup> and Estimated Future Costs associated with th MPA

MPA Premium = The MPA Revised %, divided by 100 and multiplied by the future estimated costs for the MPA (\$7 320 441) multiplied by the applicable premium (125% or 225%)

Transporter Total Payment = The total payment (representing the sum of the FDA Cost, FDA Premium MPA Cost, and MPA Premium) required for each *De Minimis* PRP identified in the VRS as a Transporter PRP

Generator Total Payment = The total payment (representing the sum of the FDA Cost FDA Premium, MPA Cost, and MPA Premium) required for each *De Minimis* PRP identified in the VRS as a Generator PRP

## Third Round De Minimis Settlement

## Volumetric Ranking Summary

(Alphabetical by PRP)

ORIGINAL

PRP Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Broker/Transporter Total Payment	Generator Total Payment	Total Payment
Accuracy Scientific Instruments	3 00	0 13	0 14	\$15 186	\$13 466	34 18	0 12	0 13	\$13 887	\$12 036			\$54 575
Airline Hydraulics Corporation						4 00	0 01	0 02	\$1 625	\$2 535			\$4 160
Allister Manufacturing						36 00	0 13	0 14	\$14 626	\$22 818			\$37 444
Ametek Inc	9 00	0 39	0 41	\$45 558	\$72 718	42 18	0 15	0 16	\$17 137	\$26 735			\$162 148
Amp	34 00	1 49	1 54	\$172 107	\$274 714	133 00	0 48	0 51	\$54 035	\$84 301			\$585 156
Ark Products	5 00	0 22	0 23	\$25 310	\$40 399	52 00	0 19	0 20	\$21 126	\$32 960			\$119 795
Athena Controls						42 00	0 15	0 16	\$17 064	\$26 621			\$43 685
Bishop Tube	60 00	2 63	2 73	\$303 718	\$484 789	130 00	0 47	0 50	\$52 816	\$82 399			\$923 722
CK Systematics Inc						17 00	0 06	0 07	\$6 907	\$10 775			\$17 682
Camdel Metals						21 00	0 08	0 08	\$8 532	\$13 311			\$21 842
Carvel Hall Inc						37 00	0 13	0 14	\$15 032	\$23 452			\$38 484
Chem Solv						2 00	0 01	0 01	\$813	\$1 268			\$2 080
Contamination Control						20 00	0 07	0 08	\$8 126	\$12 677			\$20 802
David K Robson Inc						18 00	0 07	0 07	\$7 313	\$11 409			\$18 722
E Hopkins Company						4 00	0 01	0 02	\$1 625	\$2 535			\$4 160
Emeco	3 00	0 13	0 14	\$15 186	\$24 239	3 00	0 01	0 01	\$1 219	\$1 902			\$42 546
Fabric Development						13 00	0 05	0 05	\$5 282	\$8 240			\$13 522
Fairfax Cleaners						8 00	0 03	0 03	\$3 250	\$5 071			\$8 321
Fergusson						5 96	0 02	0 02	\$2 421	\$3 778			\$6 199
Frazer Volpe Corporation						23 82	0 09	0 09	\$9 678	\$15 098			\$24 776
FTC Hazardous (Broker)						89 91	0 33	0 35	\$36 528	\$56 989	\$93 517		\$93 517
G K Garrett Corporation						27 45	0 10	0 11	\$11 152	\$17 399			\$28 551
Glah Brothers Inc						3 00	0 01	0 01	\$1 219	\$1 056			\$2 275
Gulf & Western						2 00	0 01	0 01	\$813	\$1 268			\$2 080
High Energy Company						84 64	0 31	0 33	\$34 387	\$53 648			\$88 035
Hulltronics						2 00	0 01	0 01	\$813	\$1 268			\$2 080
J & J Spill (Brokered Drums)						115 54	0 42	0 44	\$46 941	\$73 234	\$120 175		\$120 175
J & J Spill (Generator Drums)						43 00	0 16	0 17	\$17 470	\$27 255		\$44 725	\$44 725
Keystone Transformer						4 00	0 01	0 02	\$1 625	\$1 409			\$3 034
Kosempel Manufacturing Co						13 00	0 05	0 05	\$5 282	\$4 578			\$9 859
Leeds & Northrop						145 72	0 53	0 56	\$59 203	\$92 363			\$151 566
Lightman Drum Co (Brokered Drums)						48 00	0 17	0 18	\$19 501	\$30 424	\$49 926		\$49 926
Lightman Drum Co (Generator Drums)						0 27	0 00	0 00	\$110	\$171		\$281	\$281
Malco Inc						94 04	0 34	0 36	\$38 206	\$59 606			\$97 813

## Third Round De Minimis Settlement

## Volumetric Ranking Summary

(Alphabetical by PRP)

PRP Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Broker/Transporter Total Payment	Generator Total Payment	Total Payment
Matheson Instrument						20 10	0 07	0 08	\$8 166	\$12 740			\$20 906
McClarín Plastics						195 04	0 71	0 75	\$79 240	\$123 624			\$202 864
Model Finishing						25 00	0 09	0 10	\$10 157	\$15 846			\$26 003
Narco Avionics						19 00	0 07	0 07	\$7 719	\$12 043			\$19 762
National Metalcrafters						16 00	0 06	0 06	\$6 500	\$10 141			\$16 642
Ni Chro						3 00	0 01	0 01	\$1 219	\$1 902			\$3 120
Oxford Metal Products						17 00	0 06	0 07	\$6 907	\$10 775			\$17 682
Penn Airborne Products						15 31	0 06	0 06	\$6 220	\$9 704			\$15 924
Penske VDA						8 00	0 03	0 03	\$3 250	\$2 817			\$6 067
Philadelphia Steel Drum (Brokered Drums)						43 00	0 16	0 17	\$17 470	\$27 255	\$44 725		\$44 725
Philco Ford	6 00	0 26	0 27	\$30 372	\$26 933	6 00	0 02	0 02	\$2 438	\$2 113			\$61 855
Precision Arts Mfg						3 00	0 01	0 01	\$1 219	\$1 902			\$3 120
Princo Instruments Inc						79 00	0 29	0 30	\$32 096	\$50 073			\$82 169
Prodelin Inc						9 00	0 03	0 03	\$3 656	\$5 705			\$9 361
R C Kletzing						2 50	0 01	0 01	\$1 016	\$1 585			\$2 600
Sermetal						6 00	0 02	0 02	\$2 438	\$2 113			\$4 550
Shur Kut Supply Corp						7 00	0 03	0 03	\$2 844	\$4 437			\$7 281
Solid State Scientific						32 00	0 12	0 12	\$13 001	\$11 268			\$24 269
Storm Weather Products						26 00	0 09	0 10	\$10 563	\$16 480			\$27 043
Technitrol						10 00	0 04	0 04	\$4 063	\$3 521			\$7 584
U S Environmental Services (Brokered Drums)						4 00	0 01	0 02	\$1 625	\$1 409	\$3 034		\$3 034
Waste Consulting & Brokerage (Brokered Drums)						5 36	0 02	0 02	\$2 178	\$1 887	\$4 065		\$4 065
Xynatech Inc						39 00	0 14	0 15	\$15 845	\$24 720			\$40 565
<b>3rd Round De Minimis Total Number of Drums</b>	<b>120 00</b>					<b>1909 02</b>							<b>\$3,494,932</b>
<b>Site Total Number of Drums</b>	<b>2283 71</b>					<b>27608 87</b>							

Indicates 125% Premium is applied All other parties receive 225% Premium

J &amp; J Spill Total Payment = \$164 928

Lightman Drum Total Payment = \$50 247

ORIGINAL

Enclosure D  
Administrative Order of Consent III  
Volumetric Ranking Summary

ORIGINAL

ORIGINAL



08/07/2003  
ORIGINAL

Payment
\$54 575
\$4 160
\$37 444
\$162 148
\$585 156
\$119 795
\$43 685
923 722
\$17 682
21 842
38 484
\$2 080
0 802
8 722
4 160
2 546
522
321
199
776
17
51
75
80
5
0
5

Payment
\$54 575
\$4 160
\$37 444
\$162 148
\$585 156
\$119 795
\$43 685
923 722
\$17 682
\$21 842
38 484
\$2 080
\$0 802
8 722
4 160
2 546
522
321
199
776
17
51
75
30
5
0
5

Payment
\$54 575
\$4 160
\$37 444
\$162 148
\$585 156
\$119 795
\$43 685
923 722
\$17 682
\$21 842
38 484
\$2 080
\$0 802
8 722
4 160
2 546
522
321
199
776
17
51
75
30
5
0
5

Payment
\$54 575
\$4 160
\$37 444
\$162 148
\$585 156
\$119 795
\$43 685
923 722
\$17 682
\$21 842
38 484
\$2 080
\$0 802
8 722
4 160
2 546
522
321
199
776
17
51
75
30
5
0
5

Payment
\$54 575
\$4 160
\$37 444
\$162 148
\$585 156
\$119 795
\$43 685
923 722
\$17 682
\$21 842
38 484
\$2 080
\$0 802
8 722
4 160
2 546
522
321
199
776
17
51
75
30
5
0
5

Payment
\$54 575
\$4 160
\$37 444
\$162 148
\$585 156
\$119 795
\$43 685
923 722
\$17 682
\$21 842
38 484
\$2 080
\$0 802
8 722
4 160
2 546
522
321
199
776
17
51
75
30
5
0
5

Payment
\$54 575
\$4 160
\$37 444
\$162 148
\$585 156
\$119 795
\$43 685
923 722
\$17 682
\$21 842
38 484
\$2 080
\$0 802
8 722
4 160
2 546
522
321
199
776
17
51
75
30
5
0
5

Payment
\$54 575
\$4 160
\$37 444
\$162 148
\$585 156
\$119 795
\$43 685
923 722
\$17 682
\$21 842
38 484
\$2 080
\$0 802
8 722
4 160
2 546
522
321
199
776
17
51
75
30
5
0
5

Payment
\$54 575
\$4 160
\$37 444
\$162 148
\$585 156
\$119 795
\$43 685
923 722
\$17 682
\$21 842
38 484
\$2 080
\$0 802
8 722
4 160
2 546
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Payment
\$54 575
\$4 160
\$37 444
\$162 148
\$585 156
\$119 795
\$43 685
923 722
\$17 682
\$21 842
38 484
\$2 080
\$0 802
8 722
4 160
2 546
522
321
199
776
17
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75
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0
5

## Third Round De Minimis Settlement

## Volumetric Ranking Summary

(Alphabetical by PRP)

PRP Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Broker/Transporter Total Payment	Generator Total Payment	Total Payment
Matheson Instrument						20 10	0 07	0 08	\$8 166	\$12 740			\$20 906
McClarin Plastics						195 04	0 71	0 75	\$79 240	\$123 624			\$202 864
Model Finishing						25 00	0 09	0 10	\$10 157	\$15 846			\$26 003
Narco Avionics						19 00	0 07	0 07	\$7 719	\$12 043			\$19 762
National Metalcrafters						16 00	0 06	0 06	\$6 500	\$10 141			\$16 642
Ni Chro						3 00	0 01	0 01	\$1 219	\$1 902			\$3 120
Oxford Metal Products						17 00	0 06	0 07	\$6 907	\$10 775			\$17 682
Penn Airborne Products						15 31	0 06	0 06	\$6 220	\$9 704			\$15 924
Penske VDA						8 00	0 03	0 03	\$3 250	\$2 817			\$6 067
Philadelphia Steel Drum (Brokered Drums)						43 00	0 16	0 17	\$17 470	\$27 255	\$44 725		\$44 725
Philco Ford	6 00	0 26	0 27	\$30 372	\$26 933	6 00	0 02	0 02	\$2 438	\$2 113			\$61 855
Precision Arts Mfg						3 00	0 01	0 01	\$1 219	\$1 902			\$3 120
Princo Instruments Inc						79 00	0 29	0 30	\$32 096	\$50 073			\$82 169
Prodelin Inc						9 00	0 03	0 03	\$3 656	\$5 705			\$9 361
R C Kletzing						2 50	0 01	0 01	\$1 016	\$1 585			\$2 600
Sermetal						6 00	0 02	0 02	\$2 438	\$2 113			\$4 550
Shur Kut Supply Corp						7 00	0 03	0 03	\$2 844	\$4 437			\$7 281
Solid State Scientific						32 00	0 12	0 12	\$13 001	\$11 268			\$24 269
Storm Weather Products						26 00	0 09	0 10	\$10 563	\$16 480			\$27 043
Technitrol						10 00	0 04	0 04	\$4 063	\$3 521			\$7 584
U S Environmental Services (Brokered Drums)						4 00	0 01	0 02	\$1 625	\$1 409	\$3 034		\$3 034
Waste Consulting & Brokerage (Brokered Drums)						5 36	0 02	0 02	\$2 178	\$1 887	\$4 065		\$4 065
Xynatech Inc						39 00	0 14	0 15	\$15 845	\$24 720			\$40 565
<b>3rd Round De Minimis Total</b>													
<b>Number of Drums</b>	<b>120 00</b>					<b>1909 02</b>							<b>\$3,494,932</b>
<b>Site Total Number of Drums</b>	<b>2283 71</b>					<b>27608 87</b>							

Indicates 125% Premium is applied All other parties receive 225% Premium

J &amp; J Spill Total Payment = \$164 928

Lightman Drum Total Payment = \$50 247

## Third Round De Minimis Settlement

## Volumetric Ranking Summary

(by Descending Order)

PRP Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Broker/Transporter Total Payment	Generator Total Payment	Total Payment
Frazer Volpe Corporation						23 82	0 09	0 09	\$9 678	\$15 098			\$24 776
Model Finishing						25 00	0 09	0 10	\$10 157	\$15 846			\$26 003
Storm Weather Products						26 00	0 09	0 10	\$10 563	\$16 480			\$27 043
G K Garrett Corporation						27 45	0 10	0 11	\$11 152	\$17 399			\$28 551
Solid State Scientific						32 00	0 12	0 12	\$13 001	\$11 268			\$24 269
Accuracy Scientific Instruments	3 00	0 13	0 14	\$15 186	\$13 466	34 18	0 12	0 13	\$13 887	\$12 036			\$54 575
Allister Manufacturing						36 00	0 13	0 14	\$14 626	\$22 818			\$37 444
Carvel Hall Inc						37 00	0 13	0 14	\$15 032	\$23 452			\$38 484
Xynatech Inc						39 00	0 14	0 15	\$15 845	\$24 720			\$40 565
Athena Controls						42 00	0 15	0 16	\$17 064	\$26 621			\$43 685
Ametek Inc	9 00	0 39	0 41	\$45 558	\$72 718	42 18	0 15	0 16	\$17 137	\$26 735			\$162 148
J & J Spill (Generator Drums)						43 00	0 16	0 17	\$17 470	\$27 255		\$44 725	\$44 725
Philadelphia Steel Drum (Brokered Drums)						43 00	0 16	0 17	\$17 470	\$27 255	\$44 725		\$44 725
Lightman Drum Co (Brokered Drums)						48 00	0 17	0 18	\$19 501	\$30 424	\$49 926		\$49 926
Ark Products	5 00	0 22	0 23	\$25 310	\$40 399	52 00	0 19	0 20	\$21 126	\$32 960			\$119 795
Princo Instruments Inc						79 00	0 29	0 30	\$32 096	\$50 073			\$82 169
High Energy Company						84 64	0 31	0 33	\$34 387	\$53 648			\$88 035
FTC Hazardous (Broker)						89 91	0 33	0 35	\$36 528	\$56 989	\$93 517		\$93 517
Malco Inc						94 04	0 34	0 36	\$38 206	\$59 606			\$97 813
J & J Spill (Brokered Drums)						115 54	0 42	0 44	\$46 941	\$73 234	\$120 175		\$120 175
Bishop Tube	60 00	2 63	2 73	\$303 718	\$484 789	130 00	0 47	0 50	\$52 816	\$82 399			\$923 722
Amp	34 00	1 49	1 54	\$172 107	\$274 714	133 00	0 48	0 51	\$54 035	\$84 301			\$585 156
Leeds & Northrop						145 72	0 53	0 56	\$59 203	\$92 363			\$151 566
McClarin Plastics						195 04	0 71	0 75	\$79 240	\$123 624			\$202 864
3rd Round De Minimis Total Number of Drums	120 00					1909 02							\$3,494,932
Site Total Number of Drums	2283 71					27608 87							

Indicates 125% Premium is applied All other parties receive 225% Premium

\*J &amp; J Spill Total Payment = \$164 928

Lightman Drum Total Payment = \$50 247

## Third Round De Minimis Settlement

## Volumetric Ranking Summary

(by Descending Order)

PRP Name	FDA Drums	FDA %	Revised FDA %	FDA Cost	FDA Premium	MPA Drums	MPA %	Revised MPA %	MPA Cost	MPA Premium	Broker/ Transporter Total Payment	Generator Total Payment	Total Payment
Lightman Drum Co (Generator Drums)						0 27	0 00	0 00	\$110	\$171		\$281	\$281
Chem Solv						2 00	0 01	0 01	\$813	\$1 268			\$2 080
Gulf & Western						2 00	0 01	0 01	\$813	\$1 268			\$2 080
Hulltronics						2 00	0 01	0 01	\$813	\$1 268			\$2 080
R C Kletzing						2 50	0 01	0 01	\$1 016	\$1 585			\$2 600
Emeco	3 00	0 13	0 14	\$15 186	\$24 239	3 00	0 01	0 01	\$1 219	\$1 902			\$42 546
Glah Brothers Inc						3 00	0 01	0 01	\$1 219	\$1 056			\$2 275
Ni Chro						3 00	0 01	0 01	\$1 219	\$1 902			\$3 120
Precision Arts Mfg						3 00	0 01	0 01	\$1 219	\$1 902			\$3 120
Airline Hydraulics Corporation						4 00	0 01	0 02	\$1 625	\$2 535			\$4 160
E Hopkins Company						4 00	0 01	0 02	\$1 625	\$2 535			\$4 160
Keystone Transformer*						4 00	0 01	0 02	\$1 625	\$1 409			\$3 034
U S Environmental Services (Brokered Drums)						4 00	0 01	0 02	\$1 625	\$1 409	\$3 034		\$3 034
Waste Consulting & Brokerage (Brokered Drums)*						5 36	0 02	0 02	\$2 178	\$1 887	\$4 065		\$4 065
Fergusson						5 96	0 02	0 02	\$2 421	\$3 778			\$6 199
Philco Ford	6 00	0 26	0 27	\$30 372	\$26 933	6 00	0 02	0 02	\$2 438	\$2 113			\$61 855
Sermetal						6 00	0 02	0 02	\$2 438	\$2 113			\$4 550
Shur Kut Supply Corp						7 00	0 03	0 03	\$2 844	\$4 437			\$7 281
Fairfax Cleaners						8 00	0 03	0 03	\$3 250	\$5 071			\$8 321
Penske VDA*						8 00	0 03	0 03	\$3 250	\$2 817			\$6 067
Prodelin Inc						9 00	0 03	0 03	\$3 656	\$5 705			\$9 361
Technitrol						10 00	0 04	0 04	\$4 063	\$3 521			\$7 584
Fabric Development						13 00	0 05	0 05	\$5 282	\$8 240			\$13 522
Kosempel Manufacturing Co						13 00	0 05	0 05	\$5 282	\$4 578			\$9 859
Penn Airborne Products						15 31	0 06	0 06	\$6 220	\$9 704			\$15 924
National Metalcrafters						16 00	0 06	0 06	\$6 500	\$10 141			\$16 642
CK Systematics Inc						17 00	0 06	0 07	\$6 907	\$10 775			\$17 682
Oxford Metal Products						17 00	0 06	0 07	\$6 907	\$10 775			\$17 682
David K Robson Inc						18 00	0 07	0 07	\$7 313	\$11 409			\$18 722
Narco Avionics						19 00	0 07	0 07	\$7 719	\$12 043			\$19 762
Contamination Control						20 00	0 07	0 08	\$8 126	\$12 677			\$20 802
Matheson Instrument						20 10	0 07	0 08	\$8 166	\$12 740			\$20 906
Camdel Metals						21 00	0 08	0 08	\$8 532	\$13 311			\$21 842

multiplied by the applicable premium (125% or 225%)

MPA Drums = The total number of drums sent by each PRP to the Site, regardless of the date

MPA % = The total number of drums sent by the PRP to the Site, regardless of date, divided by the total number of documented drums received by Chemclene Corporation (27,608 87 drums), multiplied by 100

MPA Revised % = The total number of drums sent by the PRP to the Site, regardless of date, divided by the total number of non-orphan<sup>2</sup> drums received by Chemclene Corporation (25,986 05 drums), multiplied by 100

MPA Cost = MPA Revised % divided by 100 and multiplied by the sum of \$10,557,520 90, the total Past Cost<sup>3</sup> and Estimated Future Costs associated with th MPA

MPA Premium = The MPA Revised %, divided by 100 and multiplied by the future estimated costs for the MPA (\$7,320,441) multiplied by the applicable premium (125% or 225%)

Transporter Total Payment = The total payment (representing the sum of the FDA Cost, FDA Premium, MPA Cost, and MPA Premium) required for each *De Minimis* PRP identified in the VRS as a Transporter PRP

Generator Total Payment = The total payment (representing the sum of the FDA Cost, FDA Premium, MPA Cost, and MPA Premium) required for each *De Minimis* PRP identified in the VRS as a Generator PRP

**Malvern TCE Superfund Site**  
**Explanation Sheet for the Third Round De Minimis Settlement - Volumetric Ranking Summaries**

The following provides an explanation of the information provided in the attached Malvern TCE Superfund Site ( 'Site') Third Round De Minimis Settlement Volumetric Ranking Summary, dated 7/31/03 ("VRS")<sup>1</sup>

PRP Name = The name of the specific potentially responsible party ( ' PRP")

FDA Drums = The total number of drums sent to the Site by each PRP before August 1, 1975

FDA % = The total number of drums sent by the PRP to the Site prior to August 1, 1975, divided by the total number of documented drums received by Chemcene prior to August 1, 1975 (2,283 71 FDA drums), multiplied by 100

FDA Revised % = The total number of drums sent by the PRP prior to August 1, 1975, divided by the FDA total number of all non-orphan<sup>2</sup> FDA drums received by Chemcene Corporation prior to August 1, 1975 (2,200 69 FDA drums), multiplied by 100

FDA Cost = The FDA Revised % divided by 100 and multiplied by the sum of \$11,139,818 90 ( the total past costs<sup>3</sup> and estimated future cost associated with the FDA)

FDA Premium = The FDA Revised % divided by 100 and multiplied by future estimated costs for the FDA (\$7,902,739 00)

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<sup>1</sup> The FDA Cost, FDA Premium, MPA Cost, and MPA Premium figures are rounded to zero decimal places for display purposes only Full numbers are used in the calculation of the DeMinimis Payment

<sup>2</sup> Non-orphan drums reflect total drums into the Site, excluding drums attributed to orphans and non-settling de micromis parties The total orphan and non settling de micromis drums used for this settlement are 83 02 FDA drums and 1,622 82 MPA drums

<sup>3</sup> For purposes of this settlement, the total past costs for the Site is \$6,474,159 80 (\$5,302,459 63 in EPA Past Costs through June 26, 2002, \$359,739 17 in DOJ Past Costs through May 3, 2003, and \$811,961 00 in waterline costs incurred by the RD/RA Consent Decree PRPs) One-half of the Past Costs total, \$3,237,079 90, has been allocated to the FDA, the other half has been allocated to the MPA

ORIGINAL

**Malvern TCE Comprehensive Mailing List**

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7/30/03

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ORIGINAL

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**Malvern TCE Comprehensive Mailing List**Page 3 of 44  
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**Malvern TCE Comprehensive Mailing List**

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7/30/03

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**Malvern TCE Comprehensive Mailing List**

Page 5 of 44  
7/30/03

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**Malvern TCE Comprehensive Mailing List**Page 6 of 44  
7/30/03**LAST KNOWN CONTACT****Beemer Engineering**

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**Malvern TCE Comprehensive Mailing List**Page 7 of 44  
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**Malvern TCE Comprehensive Mailing List**Page 8 of 44  
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**Malvern TCE Comprehensive Mailing List**Page 9 of 44  
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## Malvern TCE Comprehensive Mailing List

Page 10 of 44  
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## Malvern TCE Comprehensive Mailing List

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LAST KNOWN CONTACTLAST KNOWN COUNSEL**\*\* Control Switch****Controls Service & Engineering**

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**Crown Marketing Equipment Company**

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**CSS International Corporation**

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**Malvern TCE Comprehensive Mailing List**Page 12 of 44  
7/30/03**LAST KNOWN CONTACT****Davey Products**

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**Malvern TCE Comprehensive Mailing List**Page 13 of 44  
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## Malvern TCE Comprehensive Mailing List

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7/30/03LAST KNOWN CONTACTDrexelbrook Engineering

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**Malvern TCE Comprehensive Mailing List**Page 15 of 44  
7/30/03**LAST KNOWN CONTACT****Eldredge Inc**

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**Electro Tech Systems, Inc**

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**Ellisco**

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**\*\* Party has been identified as an orphan**

**Malvern TCE Comprehensive Mailing List**

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**\*\* FBF Industries, Inc**

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**LAST KNOWN CONTACT****Fergusson Solvents Company**

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**Malvern TCE Comprehensive Mailing List**Page 18 of 44  
7/30/03**LAST KNOWN CONTACT****FTC Hazardous**

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**Malvern TCE Comprehensive Mailing List**Page 19 of 44  
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**Malvern TCE Comprehensive Mailing List**Page 20 of 44  
7/30/03**LAST KNOWN CONTACT****Hale Pumps Inc**

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**Hamilton Watch Company**

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**Handy & Harman Tube Company, Inc**

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**Malvern TCE Comprehensive Mailing List**

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**LAST KNOWN CONTACT****High Energy Company**

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**Malvern TCE Comprehensive Mailing List**Page 22 of 44  
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Wyncote PA 19095**Jetshapes, Inc**c/o Interlake ARD Corporation  
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**Malvern TCE Comprehensive Mailing List**Page 23 of 44  
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**LAST KNOWN CONTACT****Lightman Drum Company**

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**\*\* Manorgraphics****Mars Electronics, Inc**

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**Malvern TCE Comprehensive Mailing List**Page 27 of 44  
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**Malvern TCE Comprehensive Mailing List**Page 28 of 44  
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**Malvern TCE Comprehensive Mailing List**Page 29 of 44  
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**Malvern TCE Comprehensive Mailing List**Page 32 of 44  
7/30/03**LAST KNOWN CONTACT****Philadelphia Rust Proof Company, Inc**

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**Malvern TCE Comprehensive Mailing List**Page 41 of 44  
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**Malvern TCE Comprehensive Mailing List**Page 43 of 44  
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## Malvern TCE Comprehensive Mailing List

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Enclosure F  
Comprehensive Mailing List of All Site PRPs

ORIGINAL

**Enclosure G**  
**Site Documents**  
**Comprehensive Transaction Reports**

ORIGINAL

Enclosure H  
Small Business Regulatory and  
Enforcement Fairness Act Information Sheet

ORIGINAL



United States  
Environmental Protection  
Agency

Office of Enforcement and Compliance Assurance (2201A)  
EPA 300-F 99-004 September 1999

## Office of Enforcement and Compliance Assurance **INFORMATION SHEET**

### U.S. EPA Small Business Resources

If you own a small business, the United States Environmental Protection Agency (EPA) offers a variety of compliance assistance and tools to assist you in complying with federal and State environmental laws. These resources can help you understand your environmental obligations, improve compliance and find cost-effective ways to comply through the use of pollution prevention and other innovative technologies.

#### **EPA Websites**

EPA has several Internet sites that provide useful compliance assistance information and materials for small businesses. Many public libraries provide access to the Internet at minimal or no cost.

EPA's Small Business Home Page (<http://www.epa.gov/sbo>) is a good place to start because it links with many other related websites. Other useful websites include:

*EPA's Home Page*  
<http://www.epa.gov>

*Small Business Assistance Programs*  
<http://www.epa.gov/ttn/sbap>

*Compliance Assistance Home Page*  
<http://www.epa.gov/oeca/oc>

*Office of Site Remediation Enforcement*  
<http://www.epa.gov/oeca/osre>

#### **Hotlines, Helplines and Clearinghouses**

EPA sponsors approximately 89 free hotlines and clearinghouses that provide convenient assistance on environmental requirements.

EPA's Small Business Ombudsman Hotline can provide a list of all the hot lines and assist in determining the hotline best meeting your needs. Key hotlines include:

EPA's Small Business Ombudsman  
(800) 368-5888

Hazardous Waste/Underground Tanks/  
Superfund  
(800) 424-9346

National Response Center  
(to report oil and hazardous substance spills)  
(800) 424-8802

Toxic Substances and Asbestos Information  
(202) 554-1404

Safe Drinking Water  
(800) 426-4791

Stratospheric Ozone and Refrigerants  
Information  
(800) 296-1996

Clean Air Technical Center  
(919) 541-0800

Wetlands Hotline  
(800) 832-7828

Continued on back



## U.S. EPA SMALL BUSINESS RESOURCES

### Compliance Assistance Centers

In partnership with industry, universities, and other federal and state agencies, EPA has established national Compliance Assistance Centers that provide Internet and "faxback" assistance services for several industries with many small businesses. The following Compliance Assistance Centers can be accessed by calling the phone numbers below and at their respective websites:

#### Metal Finishing

(1-800-AT NMFRFC or [www.nmfrfc.org](http://www.nmfrfc.org))

#### Printing

(1-888-USPNEAC or [www.pneac.org](http://www.pneac.org))

#### Automotive Service and Repair

(1-888-GRN-LINK or [www.ccar-greenlink.org](http://www.ccar-greenlink.org))

#### Agriculture

(1-888-663-2155 or [www.epa.gov/oeca/ag](http://www.epa.gov/oeca/ag))

#### Printed Wiring Board Manufacturing

(1-734-995-4911 or [www.pwbrfc.org](http://www.pwbrfc.org))

#### The Chemical Industry

(1-800-672-6048 or [www.chemalliance.org](http://www.chemalliance.org))

#### The Transportation Industry

(1-888-459-0656 or [www.transource.org](http://www.transource.org))

#### The Paints and Coatings Center

(1-800-286-6372 or [www.paintcenter.org](http://www.paintcenter.org))

### State Agencies

Many state agencies have established compliance assistance programs that provide on-site and other types of assistance. Contact your local state environmental agency for more information. For assistance in reaching state agencies, call EPA's Small Business Ombudsman at (800)-368-5888 or visit the Small Business Environmental Homepage at <http://www.smallbiz-env.roweb.org/state.html>

### Compliance Incentives

EPA provides incentives for environmental compliance. By participating in compliance assistance programs or voluntarily disclosing and promptly correcting violations, businesses may be eligible for penalty waivers or reductions. EPA has two policies that potentially apply to small businesses. The Audit Policy (<http://www.epa.gov/oeca/auditpol.html>) and the Small Business Policy (<http://www.epa.gov/oeca/>

[smbusi.html](#)) These do not apply if an enforcement action has already been initiated.

### Commenting on Federal Enforcement Actions and Compliance Activities

The Small Business Regulatory Enforcement Fairness Act (SBREFA) established an ombudsman ("SBREFA Ombudsman") and 10 Regional Fairness Boards to receive comments from small businesses about federal agency enforcement actions. The SBREFA Ombudsman will annually rate each agency's responsiveness to small businesses. If you believe that you fall within the Small Business Administration's definition of a small business (based on your Standard Industrial Code (SIC) designation, number of employees or annual receipts, defined at 13 C.F.R. 121.201, in most cases, this means a business with 500 or fewer employees), and wish to comment on federal enforcement and compliance activities, call the SBREFA Ombudsman's toll-free number at 1-888-REG-FAIR (1-888-734-3247).

### Your Duty to Comply

If you receive compliance assistance or submit comments to the SBREFA Ombudsman or Regional Fairness Boards, you still have the duty to comply with the law, including providing timely responses to EPA information requests, administrative or civil complaints, other enforcement actions or communications. The assistance information and comment processes do not give you any new rights or defenses in any enforcement action. These processes also do not affect EPA's obligation to protect public health or the environment under any of the environmental statutes it enforces, including the right to take emergency remedial or emergency response actions when appropriate. Those decisions will be based on the facts in each situation. The SBREFA Ombudsman and Fairness Boards do not participate in resolving EPA's enforcement actions. Also, remember that to preserve your rights, you need to comply with all rules governing the enforcement process.

***EPA is disseminating this information to you without making a determination that your business or organization is a small business as defined by Section 222 of the Small Business Regulatory Enforcement Fairness Act (SBREFA) or related provisions.***